



# West Mersea Town Council

## West Mersea Town Council Full Response to Colchester City Council New Local Plan @ Regulation 18 stage January 14<sup>th</sup> 2026

The document below is the full Objection from the West Mersea Town Council and is laid out to match the Planners of Colchester City Council's format for comments.

The Major Headings are in **Blue Text**

The sub Headings are in **Green Text**

The full objection of West Mersea Town Council is **Red Text**.

The **Black Text** included is for extracts from CCC documents and other sources to put matters into Context.

The objection follows the CCC Planners Portal requirements for putting comments/objections into the Plan.

The Summary of each section is in **Purple Text** at the end of each of the major Blue Heading sections

The Town Council has also submitted an email direct to the Planners a PDF of the complete document as below.

# West Mersea Objection and comments on Local Plan @ Regulation 18 stage January 14<sup>th</sup> 2026

## 1. INTRODUCTION



West Mersea Town Council strongly objects to the proposal in Draft Local Plan to put 300 dwellings at West Mersea because the Draft Local Plan does not recognise that Mersea is an Island with restricted access due to its single tidal road with poor public transport. Also the limited room for expansion for future generations (NPPF), with the whole Island lying within the **Coastal Protection Belt and some seven other conservation areas**.

## Mersea Island, Water Quality, and Biodiversity Constraints

Mersea Island is an **ecologically sensitive and legally protected tidal island** at the confluence of the Blackwater and Colne estuaries, connected to the mainland only by the tidal causeway, The Strood. It supports **internationally important estuarine habitats**, including saltmarshes, mudflats, and shingle beaches, and is covered by multiple environmental designations, including a **Marine Conservation Zone (MCZ)**. The island is also renowned for its **native oyster fishery**, a key part of the local economy, tourism, and cultural heritage.

A recent river survey undertaken by Anglian Water and commissioned by the Environment Agency highlighted the **high frequency and volume of discharges from the West Mersea Water Recycling Centre (WRC)**. The survey identified a long-term deterioration in water quality. Despite upgrades, 2025 bathing waters recorded the **highest bacterial spike on record**, with human sewage identified as the source, demonstrating ongoing risks to sensitive marine habitats.

**Native oysters and other Priority/irreplaceable habitats** are recognised as highly threatened globally. Restoration efforts through the Essex Native Oyster Restoration Initiative are underway. The **Food Standards Agency** has confirmed that further housing on Mersea Island will have a measurable effect on water quality and **protected oyster beds**, increasing nutrient and bacterial loading. **Natural England (Feb 2023)** has requested evidence that additional development will not harm **designated marine sites**. The Plan, however, **does not reference the MCZ, nor does it assess cumulative wastewater impacts** from existing or proposed development.

The **original Dawes Lane and Brierley allocations** were approved without any consideration of the MCZ, despite functional links to sensitive habitats, and the Plan now proposes **an additional 300 dwellings at Dawes Lane**, raising the total development pressure on West Mersea to **approximately 600 homes**. The **Sustainability Appraisal** fails to assess these allocations **in combination**, contrary to SEA and Habitats Regulations, and ignores potential **significant harm** to the MCZ, SPA, Ramsar site, SAC, and Priority/irreplaceable habitats.

**Critical other constraints and infrastructure issues** are also omitted: transport impacts have not been adequately considered, and **healthcare provision is insufficient**, with nearly one full-time doctor per 2,800 patients and closed patient lists. While building extensions for medical staff are proposed, there is no evidence of increasing the number of doctors to meet demand.

Accordingly, the Plan **raises serious concerns regarding compliance** with Policies **EN1, EN3, ST7, NZ3, CS5, CS6, LC1/LC3**, and site-specific allocations including **PP23 (West Mersea)**, particularly in relation to **cumulative environmental impacts, MCZ protection, and potential significant harm to Priority and irreplaceable habitats**.



© Stephen Huntley/HVC.



Crossing onto Mersea Island just as the tide meets in the middle of the roadway B1025  
Photo by Chrissie Westgate

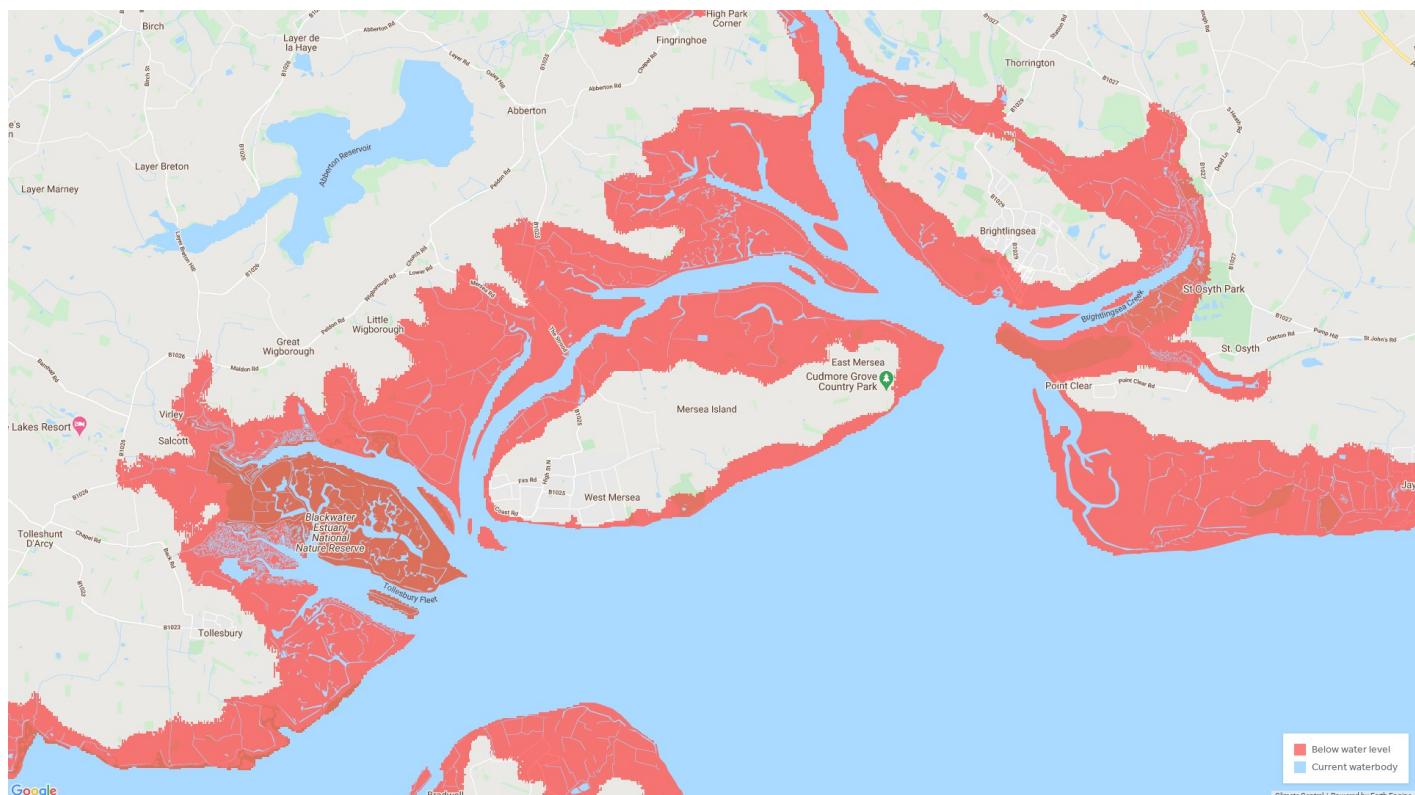


A big Spring Tide at the bottom of The Lane - Coast Road West Mersea



**A moderately High Tide situation at the Strood**

Red area indicates areas flooded to the 5m Ordnance Datum Level this would be equivalent to about 7.2 m surge high tide which overtops the seawalls, Lidar maps later showing the slump of seawalls



**THE**  
**Sun**

MONEY | DEAR DEIDRE | TECH | TRAVEL | MOTORS | PUZZLES | SUI

morning.



Two cars got stuck in a High Spring tide at the Strood, Mersea Island, Essex

Credit: Stephen Huntley/HVC

## Summary 1. INTRODUCTION

West Mersea Town Council objects to the proposal for 300 dwellings in the Draft Local Plan. Mersea is an island with restricted access through one tidal road and has internationally protected estuarine habitats, including a Marine Conservation Zone, and a nationally important native oyster fishery. The draft Plan fails to fully recognise these factors and, in some instances, fails to comply with the current NPPF. The Plan fails to include a full MCZ assessment and fails to assess cumulative wastewater impacts. Nor does the draft Plan fully address transport, healthcare provision and other factors that limit sustainable growth.

## 2. VISION AND APPROACH TO LOCAL PLAN

### Themes and Objectives

*Create communities which reduce the need to travel, particularly by car for most of their daily needs. See also NPPF Para. 109 & 110 Promoting sustainable transport.*

#### Comment:

Mersea Island can hardly be proposed as an area meeting these objectives with all the issues outlined and concerns due to access route onto the Island.





One of Mersea Island Red Squirrels photo Chrissie Westgate

### 3. STRATEGIC POLICIES

#### ST1: Health and Wellbeing

##### Comment:

Policy ST1(f) requires that new development provides access for all to health facilities and services. However, the health assessment provides no forecast data for the West Mersea Surgery. Current medical provision is insufficient, with the doctor-to-patient ratio at approximately 1 full-time doctor per 2,800 patients (North East Essex figure is 2008), significantly above the national standard of 1:1,800, and patient lists are closed. Previously reported weighted patient numbers were 8,183 (102 East Road, 3 August 2020) and 8,238 (Dawes Lane, 6 March 2020, Carr-Hill formula). While the Plan indicates potential extensions to existing medical facilities, there is no commitment to increasing the number of doctors to meet patient demand. Access to off-island medical centres is also constrained by the tidal causeway and limited public transport, creating practical barriers to timely healthcare. Without evidence of increased capacity or mitigation, ST1(f) cannot be demonstrated, and the Plan fails to ensure adequate health provision for new and existing residents.

#### **Summary 3.STRATEGIC POLICIES**

#### *ST1: Health and Wellbeing*

Policy ST1(f) requires that new development provides access for all to health facilities and services. However, the health assessment provides no forecast data for the West Mersea Surgery. Current medical provision is approximately 1 full-time doctor per 2,800 patients, significantly above the national standard of 1:1,800, and patient lists are closed. There is no commitment to increasing the number of doctors to meet patient demand. Without evidence of increased capacity or mitigation, ST1(f) cannot be demonstrated, and the Plan fails to ensure adequate health provision for new and existing residents.

## ST2: Environment and the Green Network and Waterways

### Comment:

Policy ST2 commits to protecting and enhancing Colchester's natural environment, including rivers, estuaries, and coastal areas, and ensuring sustainable management of water resources. On Mersea Island:

- i) Cumulative housing development (existing, under construction, and proposed, approximately 600 homes) has not been fully assessed for its impact on water quality, nutrient loading, or sensitive habitats.
- ii) West Mersea WRC discharges have already caused record bacterial spikes in bathing waters, confirmed by Environment Agency / Anglian Water surveys, demonstrating a link between wastewater and declining water quality.
- iii) Natural England (Feb 2025) advises:  
*"We are keen to ensure that the Local Plan is able to evidence adequate sewage treatment infrastructure / Water Recycling Centre (WRC) capacity to serve new development without increasing the nutrient and pollutant load of WRC final effluent discharges and adverse impact to sensitive designated sites including Essex Estuaries Special Area of Conservation (SAC) and Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (MCZ)."*
- iv) The 2021 Sanitary Survey (Carcinus Ltd / FSA) warns:  
*"Housing developments increase bacterial loading...[which] can negatively affect shellfish, including oysters, and impede the recovery of Marine Conservation Zone features."*
- v) The Local Plan does not reference the MCZ nor provide evidence of sufficient WRC capacity. Failure to assess cumulative impacts from all existing and proposed housing risks breaching ST2 objectives, as estuarine habitats, intertidal areas, and native oyster beds are highly sensitive and protected.

### Conclusion:

Without robust assessment and mitigation of wastewater impacts, ST2 cannot be demonstrated for Mersea Island, and the Plan fails to protect water quality, estuarine habitats, and the coastal environment. The Plan should reinstate a Mersea-specific policy, aligned with the WMNP, to ensure ST2 objectives are achieved.

## Summary 3.STRATEGIC POLICIES

### ST2: Environment and the Green Network and Waterways

Without robust assessment of Cumulative housing development (existing, under construction, and proposed, approximately 600 homes) and mitigation of wastewater impacts, ST2 cannot be demonstrated for Mersea Island, and the Plan fails to protect water quality, estuarine habitats, and the coastal environment. The Plan should reinstate a Mersea-specific policy, aligned with the WMNP, to ensure ST2 objectives are achieved.

## ST3: Spatial Strategy

### Comment:

#### Large settlements

Whilst West Mersea is a larger settlement outside Colchester it is fairly remote with major facilities being some 13 Km away. Also the Station, Hospital and larger recreation facilities are on the North side of Colchester which entails negotiating the traffic pinch points to these facilities. Again public transport is difficult with the tidal Strood and change of buses at a chaotic bus station in Colchester.

## ST7: Infrastructure Delivery and Impact Mitigation

Comments:

### **Colchester infrastructure Audit and Delivery plan - Electricity**

Table 5-1	Primary Substation	Peldon Primary	1	1kV
	Current Max Demand (MW)			15
	Demand Headroom Availability			36.7%
	Max Capacity (MW)			23.7
	Spare Capacity (MW)			8.7
	Est increase for emerging development			4.8
	Est 2041 Peak Demand (MW)			19.8
	Demand Headroom Availability			Green (Over 5%)

However there seems to be little or no consideration for the 300 proposed dwellings at West Mersea not being allowed to fit Gas Boilers and therefore presumably requiring night store/electric heating or Heat pumps.

Also no allowance seems to have been indicated for the 64.4%\* of the dwellings at West Mersea having Gas Boilers and 14.4 %\* having Oil Fired Boilers. All to be converted before the end of 2050, some 9 years after the plan period 2041.

No allowance for electric car charging and the general increase in usage of electrical devices.

It is noted that there is now a coffer damn around the main electric sub station supplying Mersea Island and we hope this will work in practice.

\* WMPP survey of households 2020

ST7 requires that necessary infrastructure is in place to support development and mitigate its impacts. Without proper assessment and provision for additional sewerage arising from new development, key infrastructure requirements are not secured. This undermines ST7, as well as the effectiveness of Policies LC1 (Landscape), EN3 (Biodiversity and Geodiversity) and ST2 (Environment, Green Network and Waterways), because environmental impacts on waterways, habitats, and landscapes cannot be properly mitigated. Policy EN3 (Biodiversity and Net Gain) requires development to avoid harm to habitats and species and deliver measurable net gains for biodiversity. Additional sewerage and wastewater from new development can degrade water quality in rivers, estuaries and coastal areas, harming habitats and species and making net gain unachievable. Where sewerage impacts are not properly assessed or mitigated, compliance with EN3 cannot be demonstrated, and the objectives of ST2 (Environment, Green Network and Waterways) and ST3 (Infrastructure Delivery and Impact Mitigation) are also undermined.

#### **WRC Capacity & Wastewater:**

- i) The IADP does not demonstrate that the Water Recycling Centre (WRC) can accommodate cumulative housing allocations (~600 dwellings, including existing Local Plan and West Mersea Neighbourhood Plan dwellings).
- ii) The only operational change (increased storm flow) does not provide additional treatment capacity for new development.

#### **Environmental Policies at Risk:**

Without adequate wastewater mitigation, development risks breaching:

- LC1 – Landscape and Coast
- LC3 – Coastal Protection Belt
- EN3 – Biodiversity and Net Gain
- ST2 – Environment, Green Network and Waterways
- ST3 – Infrastructure Delivery and Impact Mitigation

**Marine Conservation (MCZ/SAC):**

- i) Features of the MCZ (native oyster beds, intertidal sediments) and the Essex Estuaries SAC are in unfavourable condition and under active recovery.
- ii) Any additional nutrient, chemical, or bacterial load from the WRC will hinder recovery and compromise conservation objectives.
- iii) The 2021 FSA Sanitary Survey confirms that housing developments increase bacterial loading, which negatively affects shellfish, including oysters.

**Cumulative Impacts:**

All existing and proposed housing allocations must be considered together in assessing WRC capacity and environmental impacts.

**Required Actions for Sound Plan:**

1. Provide evidence of cumulative WRC capacity for all housing allocations.
2. Include timing and delivery of wastewater infrastructure upgrades before occupation.
3. Assess and mitigate impacts on MCZ, SAC, and coastal/estuarine landscapes.
4. Reinstate a Mersea Island-specific policy to protect sensitive coastal and estuarine areas.

**Conclusion:**

**Without these measures, the IADP is incomplete, and the Local Plan cannot be considered sound.**

## **Summary 3.STRATEGIC POLICIES**

### ***ST7: Infrastructure Delivery and Impact Mitigation***

No consideration for the 300 proposed dwellings at West Mersea not being allowed to fit Gas Boilers and therefore presumably requiring night store/electric heating or Heat pumps. Or for the replacing of the some 3000+- existing oil and gas boilers.

Without proper assessment and provision for additional sewerage arising from new development, the IADP is incomplete, and the Local Plan cannot be considered sound.

## **4. ENVIRONMENT**

### **EN1: Nature Conservation Designated Sites**

**Comment:** See LC1 BELOW

### **EN2: BNG**

**Comment:**

*4.8 Natural England consider that Maydays Farm would provide an excellent opportunity to create valuable habitat for wading birds and enhance habitat connectivity. The site is in a strategic location, adjacent to the Colne Estuary SSSI. The land is entirely below 5m AOD and adjacent to the Pyefleet Channel making it suitable for the creation of grazing marsh and associated freshwater habitats. It would also be suitable for the creation of intertidal habitats, although they are currently outside the remit of BNG.*

However, alternative SANGs should not be allocated on Mersea Island unless they are directly linked to development on Mersea itself. Using off-island mitigation for Mersea development

would undermine the local environmental integrity, connectivity, and ecological resilience and would conflict with the intent of Policy EN2 to secure direct, locally appropriate biodiversity net gain.

### **EN3: Biodiversity and Geo diversity**

#### **Comment:**

Policy EN3 requires that new development protects and enhances biodiversity and geodiversity, delivering net gains wherever possible. On Mersea Island, the sensitive estuarine habitats, saltmarshes, mudflats, and intertidal areas are already under pressure from cumulative impacts, including wastewater discharges from the West Mersea WRC.

Additional housing, without full assessment and mitigation, risks further nutrient and bacterial loading, harming native oyster beds, wading birds, and protected habitats (MCZ, SAC, SSSI). These impacts undermine the ability to achieve net gain and may hinder ongoing restoration efforts such as the Essex Native Oyster Restoration Initiative (ENORI).

Without robust cumulative assessment and mitigation, EN3 cannot be demonstrated for proposed development on Mersea Island, and the Plan fails to secure the biodiversity and geodiversity objectives it sets out.

## **Summary 4. ENVIRONMENT**

### **EN3: Biodiversity and Geo diversity**

Policy EN3 requires that new development protects and enhances biodiversity and geodiversity, delivering net gains wherever possible. On Mersea Island, the sensitive estuarine habitats, saltmarshes, mudflats, and intertidal areas are already under pressure from cumulative impacts, including wastewater discharges from the West Mersea WRC.

Additional housing, without full assessment and mitigation, risks further nutrient and bacterial loading, harming native oyster beds, wading birds, and protected habitats (MCZ, SAC, SSSI).

Without robust cumulative assessment and mitigation, EN3 cannot be demonstrated for proposed development on Mersea Island, and the Plan fails to secure the biodiversity and geodiversity objectives it sets out.

### **EN4: Irreplaceable Habitats**

#### **Comment:**

**Red squirrels** are present on the Island and care must be taken to protect their habitats.

#### **Oyster Habitats**

Additional housing, without full assessment and mitigation, risks further nutrient and bacterial loading, harming native oyster beds, wading birds, and protected habitats (MCZ, SAC, SSSI). These impacts undermine the ability to achieve net gain and may hinder ongoing restoration efforts such as the Essex Native Oyster Restoration Initiative (ENORI).

## 5. GREEN NETWORK AND WATERWAYS

### GN1: Open Spaces and Green Network and Waterways

#### Comment:

**Open space** - All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

The harbour area of Mersea Island should be designated under the above definition within the plan documents. Bearing in mind a lot of the areas around Mersea Island are used for visual appreciation as well as recreation but do fall within some of the most protected sites as well.

### GN2: Strategic Green Space & Nature Recovery

#### Comment:

See LC3 below and EN4 above

### GN3: Local Green Spaces

#### Comments:

Because the WMNP will be out of date and unlikely to be updated because of the cost and time of doing revisions every 5 years will our designated Local Green Spaces be protected in future? If so how will they be logged if no new NP?

### GN5: Suitable Alternative Natural Green space

#### Comments:

Here again alternative SANG's should not be put upon Mersea unless they directly belong to development on Mersea Island.

& EN2 4.8 Natural England consider that Maydays Farm would provide an excellent opportunity to create valuable habitat for wading birds and enhance habitat connectivity. The site is in a strategic location, adjacent to the Colne Estuary SSSI. The land is entirely below 5m AOD and adjacent to the Pyefleet Channel making it suitable for the creation of grazing marsh and associated freshwater habitats. It would also be suitable for the creation of intertidal habitats, although they are currently outside the remit of BNG.

### GN6: Retention of Open Space

#### Comments:

Again as above Because the WMNP will be out of date and unlikely to be updated because of the cost and time of doing revisions every 5 years will our designated Local Green Spaces be protected in future? If so how will they be logged if no new NP?

## 6. LANDSCAPE AND COAST

### LC1: Landscape

#### Comments:

The development proposed under policy PP23: Land East Dawes Lane falls within the Coastal Protection Belt and is productive farm land.



Policy LC1 (Landscape) seeks to protect and enhance landscape character, the setting of valued landscapes, and the coast. Additional sewerage and wastewater from new development can cause indirect and cumulative harm through degraded watercourses, estuaries, and coastal waters, impacting habitats, landscape character, and visual amenity. Where these impacts are not properly assessed or mitigated, compliance with LC1 cannot be demonstrated, and the objectives of ST2 (Environment, Green Network and Waterways), ST3 (Infrastructure Delivery and Impact Mitigation), and EN3 (Biodiversity and Net Gain) are also undermined.

The estuarine and coastal areas of the island are covered by international & local nature conservation designations – Coastal Protection Belt (CPB) - Site of Special Scientific Interest (SSSI) - Special Protection Areas (SPA) – National Nature Reserve (NNR) – Ramsar Site - the Essex Estuaries Special Area of Conservation. (SAC), Marine Conservation Zone (MCZ) and the National Character Area 81 – Greater Thames Estuary (NCA) These designations are a significant constraint on settlement expansion, particularly when in-combination their effects are considered.

Appeal decisions support this approach. In APP/A1530/W/21/3285769, the Inspector concluded that development within the Coastal Protection Belt on Mersea Island would conflict with policies protecting the character of the coast and countryside, even when the site was not immediately adjacent to the coast, noting the broader context of National Character Area 81 and the CPB. This

establishes clear precedent that coastal and estuarine landscapes are highly sensitive to development impacts, including cumulative and indirect environmental effects.

Further the Landscape Character Assessment report states on pages 262 & 279 “*New development within the area should be avoided.*”

#### **Conclusion:**

The Local Plan cannot be considered sound unless it explicitly assesses and mitigates additional sewerage and wastewater impacts on these sensitive landscapes, habitats, and designations, ensuring compliance with LC1, EN3, ST2, and ST3.

## **SUMMARY 6. LANDSCAPE AND COAST**

### **LC1: Landscape**

The development proposed under policy PP23: Land East Dawes Lane falls within the Coastal Protection Belt and is productive farm land which seeks to protect and enhance landscape character. Additional sewerage and wastewater from new development can cause indirect and cumulative harm through degraded watercourses, estuaries, and coastal waters, impacting habitats, landscape character, and visual amenity.

The Local Plan cannot be considered sound unless it explicitly assesses and mitigates additional sewerage and wastewater impacts on these sensitive landscapes, habitats, and designations, ensuring compliance with LC1, EN3, ST2, and ST3.

### **LC3: Coastal Areas**

#### **Comments:**

Policy LC3 seeks to protect the undeveloped character, landscape, and setting of the coast, restricting development that would adversely affect coastal landscapes, visual amenity, or ecological and cultural assets. On Mersea Island, most undeveloped land falls within this designation, including sensitive salt marshes, mudflats, and intertidal habitats.

#### **Environmental Sensitivity**

Mersea Island and other coastal areas contain multiple international, national, and local designations:

- Coastal Protection Belt (CPB)
- Site of Special Scientific Interest (SSSI)
- Special Protection Areas (SPA)
- Ramsar Sites
- National Nature Reserves (NNR)
- Essex Estuaries Special Area of Conservation (SAC)
- Marine Conservation Zones (MCZ)
- National Character Area 81 – Greater Thames Estuary (NCA)

These designations restrict where development can occur and require careful environmental assessment before planning permission is granted.

#### **Indirect and Cumulative Impacts**

Development, including new housing, can produce sewerage and wastewater discharges that degrade water quality, harm estuarine habitats, native oyster beds, and intertidal areas, and affect landscape and visual amenity. A recent Environment Agency/Anglian Water survey confirms the West Mersea WRC has caused record bacterial spikes in bathing waters, directly impacting sensitive marine environments. FSA guidance indicates that additional housing will further increase nutrient and bacterial loading, posing risks to both the marine ecosystem and local tourism.

#### **Legal and Policy Precedent**

Appeal decisions (e.g., APP/A1530/W/21/3285769) confirm that development within the CPB, even if not immediately adjacent to the coast, can conflict with policies protecting landscape and countryside character. This sets a clear precedent: the CPB is a significant constraint, and new development must not compromise its objectives.

### Infrastructure Considerations (ST3 / NZ3)

Any development within or near the CPB must demonstrate adequate infrastructure, particularly wastewater treatment, to prevent harm to the coastal environment. The Plan currently does not assess cumulative wastewater impacts from nearly 600 homes (existing, under construction, and proposed) nor the capacity of the WRC to serve new development without harming the MCZ, SAC, or local bathing waters.

### Conclusion.

Colchester City Council must ensure that LC3 is enforced consistently with environmental designations, indirect and cumulative impacts (especially from sewerage), and strategic policies ST2 and ST3, so that the Coastal Protection Belt's objectives—protecting landscape, ecology, and visual amenity—are not compromised. How can stakeholders, residents, or the Inspector have confidence in this proposed Local Plan when key statutory regulators — **Natural England and the Food Standards Agency (FSA)** — have raised clear concerns about wastewater impacts, nutrient loading, and risks to sensitive habitats, yet these warnings are not addressed or incorporated in the Plan?

Ignoring the advice of these regulators means the Plan does not evidence compliance with statutory environmental duties, fails to ensure protection of highly sensitive and protected sites (MCZ, SAC, SSSI), and leaves critical infrastructure and environmental mitigation untested. Without this regulatory compliance, the Plan cannot be considered sound, deliverable, or safe for the community, marine life, or tourism-dependent economy.



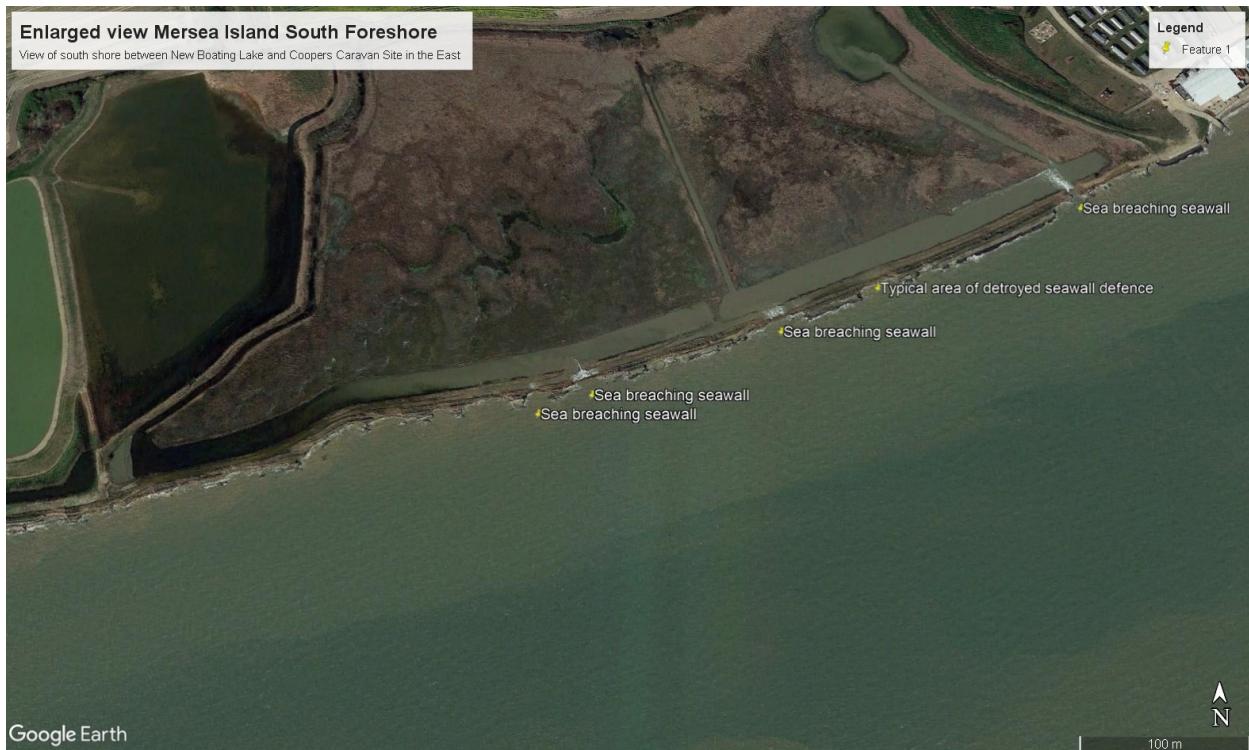
Mersea Island Photos by Chrissie Westgate



### *The King Charles III England Coast Path. Para.5*

This footpath which was designated to go around the whole Island, mostly by way of the top of the seawall, has yet be confirmed and is fast eroding on the southern shore, whilst land side alternatives were proposed these have yet to be implemented or sign posted.

The other issue is the demise of the seawalls protecting the Island. The southern and south-east corner of the Island is rapidly eroding due to both sea level rise and increasing extreme weather conditions.



The harbour area has been subject to two recharges of material to protect and is now about to have another recharge as below. This to protect the harbour area and all associated activities that take place within the harbour, fishing fleet, oysterling and the oyster beds, and many hundreds of moorings all of which the Island depend upon for a living and the associated vital Tourist Industry. See below for more detail about the project.

## Blackwater Estuary Natural Flood Management Project



Essex  
Wildlife Trust

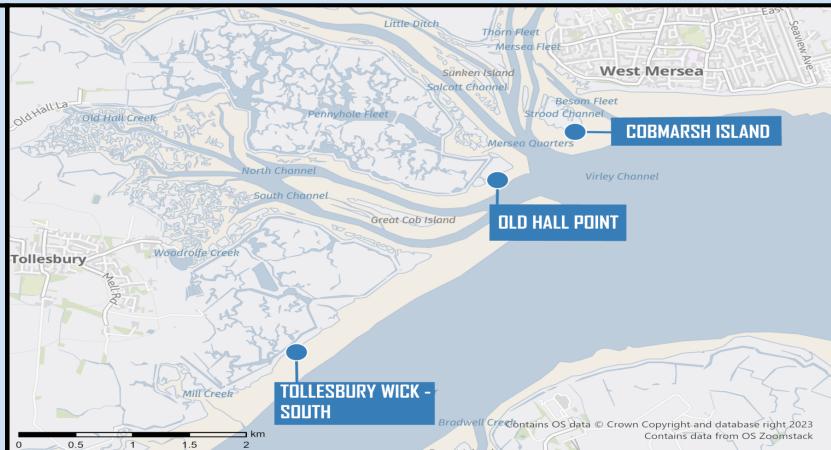


### What is the Blackwater Estuary Natural Flood Management Project?

The Blackwater Estuary Natural Flood Management (NFM) project involves the Beneficial Use of Dredged Sediment (BUDS) to create and replenish sand and gravel beaches to protect coastal communities from flooding whilst creating new habitats for beach-nesting birds and other key species. The project will be delivered by the RSPB, Essex Wildlife Trust (EWT) and Harwich Haven Authority (HHA) and funded through the Environment Agency's £25m Natural Flood Management (NFM) programme.

### Where is it?

The Blackwater Estuary is the estuary of the River Blackwater, between Maldon and West Mersea. It is a designated Site of Special Scientific Interest (SSSI), a Special Area of Conservation (SAC), a Special Protected Area (SPA) and a Ramsar Wetland of international importance. It also contains RSPB Old Hall Marshes and EWT Tollesbury Wick nature reserves. The project proposes to deliver sediment to three sites: Old Hall Point, Cobmarsh Island and Tollesbury Wick.



### When is it happening?

The project development phase is from April 2024 and will include engagement as well as installation of baseline monitoring. The delivery phase is from October 2025 to March 2027.

### What are the benefits?

- Protection of 25km of coastal flood defence and 289 residential and commercial properties in West Mersea, Tollesbury and Salcott;
- Protection of 406 Ha of coastal floodplain grazing marsh, 240 Ha of coastal saltmarsh, and oyster layings in West Mersea harbour;
- Protection of boat moorings in the Blackwater estuary and Tollesbury Marina; and
- Creation and replenishment of 6.7 Ha of vegetated shingle beach habitat for beach nesting birds.



### What will it look like?

The proposed schemes are large in scale, and from the ground will look like an extension of naturally formed shingle beach habitat and in keeping with the natural environment. The picture of the Cobmarsh Island scheme, previously delivered by Mersea Harbour Protection Trust in 2022, demonstrates what they will look like. Photo credit: Jim Pullen.



### For questions or to find out more:

Email: [blackwatersfm@rspb.org.uk](mailto:blackwatersfm@rspb.org.uk)



**Houseboat statement** while mention of coastal areas what about non coastal areas, such as at the Hythe and Wivenhoe?

West Mersea does need it's **own specific Houseboat Policy** requirements and restrictions. Whilst these are covered in the present Colchester plan and the WMNP neither of these will exist after this new plan takes effect and therefore must be specifically included, as below for West Mersea.

The policy as now presented appears to be a generic policy applying to the whole of Colchester whereas under the existing plan there is a specific policy applying to Mersea Island and we believe this should be maintained and reinstated into the new plan. (Colchester Hythe Quay and Wivenhoe also have some houseboats and may need their own specific policy)

This paragraph on Houseboats also does not quite accord with the WMNP therefore this paragraph should be replaced by the WMNP as we believe it is more comprehensive as below:

#### *Policy WM 9 – Houseboats*

*Proposals for new moorings for permanent residential houseboats will not be permitted in coastal areas including Coast Road because of their landscape and environmental impact on the internationally designated habitats.*

*Proposals to replace an existing houseboat or fill a vacant site that is identified on Map 4 as being a recently used site maybe supported, subject to an installation method statement being submitted which avoids impacts to salt-marsh habitats and which satisfy all other policy criteria.*

*In considering proposals for houseboats and associated development, the following matters will be taken into account:*

*i. the proposal should maintain the general character of the houseboat area;*

*ii. houseboat proposals should not have a detrimental impact upon the natural environment but should respect the unique habitat within which they are situated;*

iii. the storage of waste and any associated domestic paraphernalia would not have a harmful effect on the character or setting of the surrounding area.

iv. the open views across the marshes are not significantly harmed as a result of the proposal

Proposals for houseboat projects (replacement boats, ancillary jetties and any structures) will be required to include sufficient information to undertake a Habitats Regulations Assessment and, where necessary, an Appropriate Assessment. Proposals should demonstrate that they have, or are capable of providing, adequate on-site sewage/pump-out systems in order to mitigate potential damage to the salt marsh and a reduction of water quality.

Applications for infrastructure to support existing houseboats including jetties, sheds, platforms and fences and for replacement houseboats or houseboat alterations considered to result in material alterations will be considered on the basis of their scale and impact on surrounding amenity, environment and landscape.



## SUMMARY 6.

### LC3: Coastal Areas

Policy LC3 seeks to protect the undeveloped character, landscape, and setting of the coast, restricting development that would adversely affect coastal landscapes, visual amenity, ecological and cultural assets. Most undeveloped land falls within this designation, including salt marshes, mudflats, and intertidal habitats.

Natural England and the Food Standards Agency (FSA) — have raised clear concerns about wastewater impacts, nutrient loading, and risks to sensitive habitats, yet these warnings are not addressed or incorporated in the Plan?

West Mersea does need its **own specific Houseboat Policy** requirements and restrictions. As percentage WMNP *Policy WM 9 – Houseboats*

## 7. NET ZERO HOMES ETC....

### NZ1: Net Zero Carbon Development (in operation)

#### Comments:

From *Newmark Viability and Delivery Assessment Policies* page 25

#### 2. Requirement 2: Fossil Fuel Free

- a) *No new buildings shall be connected to the gas grid; and*
- b) *fossil fuels must not be used on-site to provide space heating, domestic hot water or cooking*

Note these conditions for Dawes Lane site PP23 did include no gas central heating, which we would certainly support and wonder why this is not more universal.

### NZ3: Wastewater and Water Supply

Policy NZ3 requires that new development has adequate wastewater treatment and water supply infrastructure in place before occupation, and that development does not compromise environmental quality or designated sites.

Key issues for Colchester:

#### 1. Wastewater Capacity

- i) The Local Plan does not provide evidence that the Water Recycling Centre (WRC) can accommodate the additional load from proposed development, including existing allocations (~280 homes) and new allocations (~600 homes in total).
- ii) The only operational change (increased storm flow) does not address treatment capacity for new housing.

#### 2. Environmental Impacts

- i) Additional effluent threatens the Essex Estuaries SAC and Blackwater, Crouch, Roach and Colne Estuaries MCZ, both in unfavourable condition and under active recovery
- ii) Increased nutrient, bacterial, and chemical loading would undermine biodiversity net gain (EN3), damage landscape and coastal character (LC1/LC3), and hinder the objectives of ST2/ST3.

### 3. Cumulative Impacts

NZ3 requires infrastructure planning to consider cumulative impacts. A full assessment must include all existing and proposed dwellings to ensure the WRC and water supply can support growth without environmental harm.

### 4. Recommendation

Before further allocations, CCC must assess cumulative wastewater impacts, provide clear evidence of WRC capacity, and ensure mitigation measures are in place to protect sensitive coastal and estuarine habitats.

## Economic Impacts of Pollution on Mersea

*“Policy EN1: Nature Conservation Designated Sites – Development proposals that have adverse effects on the integrity of habitats, designated sites, or Sites of Special Scientific Interest, either alone or in combination, will not be supported.”*

### Oyster Industry:

- i) Native oyster beds in the MCZ are highly sensitive to nutrient, bacterial, and chemical loading.
- ii) Pollution from WRC effluent or CSO events could degrade water quality, halt oyster recovery, and directly threaten the livelihoods of local oystermen.

### Tourism and Recreation:

- i) Elevated bacterial and chemical levels in estuaries and bathing waters reduce recreational value.
- ii) Tourism, water sports, and hospitality businesses would suffer significant economic losses if water quality declines.

### Cumulative and Event-Based Pollution:

- i) CSO spikes and cumulative discharges from existing and proposed housing developments amplify these risks.
- ii) Unmanaged or poorly mitigated wastewater discharge threatens the long-term sustainability of both aquaculture and coastal tourism, key economic drivers for the area.

### Policy Implications:

- i) Without infrastructure upgrades and proper wastewater management, economic impacts are inevitable, alongside environmental degradation.
- ii) Local Plan policies (LC1, LC3, EN3, ST2/ST3, NZ3) must explicitly consider economic as well as ecological consequences of additional pollution.

## SUMMARY 7.

## NZ3: Wastewater and Water Supply

### Cumulative and Event-Based Pollution:

- i) CSO spikes and cumulative discharges from existing and proposed housing developments amplify these risks.
- ii) Unmanaged or poorly mitigated wastewater discharge threatens the long-term sustainability of both aquaculture and coastal tourism, key economic drivers for the area.

### Policy Implications:

- i) Without infrastructure upgrades and proper wastewater management, economic impacts are inevitable, alongside environmental degradation.

- ii) Local Plan policies (LC1, LC3, EN3, ST2/ST3, NZ3) must explicitly consider economic as well as ecological consequences of additional pollution.

## NZ4: Renewable Energy

### Comments:

All new properties built on Mersea Island should have Solar Panels

## 8. HOMES

### H1: Housing Mix

#### Comments:

Should it found necessary to put 300 further dwellings at West Mersea

*From WMNP*

#### **Policy WM 6 - Housing Mix**

*In all housing developments of ten or more homes, there shall be an emphasis on providing a higher proportion of one and two bedoomed houses and bungalows within the scheme, unless it can be demonstrated that the particular circumstances relating to the tenure of the housing dictate otherwise or where such provision is demonstrated to not be in accordance with the latest available housing needs information for the Plan Area.*

### H2: Affordable Housing

Alms Houses for local people on the housing list should be provided if any new development takes place.

## 9. ECONOMY

### Policy E1 - E2 - E3:

#### Comments:

Also see CS5 – Tourism, Leisure, Arts and Culture (Oyster Impact Focus)

*“Policy EN1: Nature Conservation Designated Sites – Development proposals that have adverse effects on the integrity of habitats, designated sites, or Sites of Special Scientific Interest, either alone or in combination, will not be supported.”*

#### Oysters as a Critical Economic and Cultural Resource:

- i) Native oyster beds in the MCZ are central to local livelihoods, aquaculture tourism, and heritage activities.
- ii) Any additional nutrient, chemical, or bacterial pollution from WRC effluent, CSO events, or cumulative housing discharges would degrade oyster beds.
- iii) Such degradation would be catastrophic, halting recovery efforts, threatening oystermen's livelihoods, and undermining aquaculture- based tourism, including oyster festivals, seafood experiences, and heritage tourism.

## Tourism and Recreational Impacts:

- i) Degraded estuarine and coastal water quality would reduce the attractiveness of bathing waters, beaches, and recreational activities, harming local tourism revenue.
- ii) Visitors are deterred by pollution events, bacterial spikes, or visibly degraded coastal environments, which directly impacts hotels, restaurants, and leisure providers.
- iii) The harbour area protection for leisure and commercial boating is vital to the local economy

## Cumulative Impacts:

- i) Existing and proposed housing (~600 dwellings) increase effluent load, with direct implications for oyster beds, estuarine ecology, and tourism.
- ii) CSOs and WRC discharges exacerbate risks, particularly during storm events.

## Policy Implications:

- i) To comply with CS5, development must protect tourism assets: oyster beds, bathing waters, coastal recreation, and cultural heritage.
- ii) Required measures include:
  1. Full cumulative assessment of wastewater and CSO impacts.
  2. Infrastructure upgrades at the WRC before development occupation.
  3. Mitigation measures to prevent degradation of oyster beds, estuarine habitats, and recreational water quality.

## Conclusion:

- i) The downgrading or loss of oyster beds would be catastrophic for both Mersea Island and Colchester's economy, tourism, and cultural heritage.
- ii) Tourism and aquaculture must be explicitly prioritised in planning and infrastructure decisions.

## **SUMMARY 9. ECONOMY**

### *E1: Protection of Employment*

The downgrading or loss of oyster beds would be catastrophic for both Mersea Island and Colchester's economy, tourism, and cultural heritage. Tourism and aquaculture must be explicitly prioritised in planning and infrastructure decisions. The harbour area protection for leisure and commercial boating is vital to the local economy

### *E2: Economic Development in Rural Areas and the Countryside*

Native oyster beds in the MCZ are central to local livelihoods, aquaculture tourism, and heritage activities. Any additional nutrient, chemical, or bacterial pollution from WRC effluent, CSO events, or cumulative housing discharges would degrade oyster beds. Such degradation would be catastrophic, halting recovery efforts, threatening oystermen's livelihoods, and undermining aquaculture based tourism, including oyster festivals, seafood experiences, and heritage tourism.

### *E3: Agricultural Development and Diversification*

Native oyster beds in the MCZ are central to local livelihoods, aquaculture tourism, and heritage activities. A recent Environment Agency/Anglian Water survey confirms the West Mersea WRC has caused record bacterial spikes in bathing waters, directly impacting sensitive marine environments. This impact undermine the ability to achieve net gain and may hinder ongoing restoration efforts such as the Essex Native Oyster Restoration Initiative (ENORI).

## **10. COMMUNITY AND SOCIAL INFRASTRUCTURE**

### *CS1: Retention of Community Facilities*

Comments:

Shopping Area Map page 899/1342

Church Road shopping goes too far west

Barfield Road shopping area in middle of south side area should extend back to Folly/FP

### *CS2: Enhancement of and Provision for Community Facilities*

Comments:

The Infrastructure Audit & Delivery Plan Stages 1 & 2 Report misses a number of West Mersea Assets.

Mersea Museum

Mersea Barrow

Firs Road Burial Grounds

Feldy View Burial ground

No Data for Mersea Medical situation. The doctors list has been closed since July 2024 but no actual number of patient or number of GPs or GP patient ratio mentioned to show the desperate situation for any new resident moving onto the Island and finding they can not register with the Island practice as the list is closed. There is knock on effect as residents try and register with a Doctor off the Island only to find their lists are also closing. Also the Dentist list for NHS patients is full.

## Voluntary emergency services

The Island has to rely on the several voluntary organisation to provide emergency support for the community. Retained fire firemen, now about 7 persons, who need to come from the local community normally working and living within 5 minutes of the station. Last year 2025 they had nearly 300 call-outs which when one considers they have to earn a living and or patient employer makes for difficult situations. Lifeboat station requires a large team for launching authorities, launchers and crew all active and fit and again working/living locally. Auxiliary Coastguard team to coordinate Lifeboat and water incidences. A team of First Responders again need to be living/working on the Island. Because we are an Island which can be cut off from the mainland support all the teams are of critical importance and with no large employers it does result in need for self employed volunteers who are fit and able. The population age profile has again grown in the last tens year (census data 2011/2021) from 39.9% to 44.2% for the over 60's, this issue will become more of a problem for recruitment of young active volunteers.



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## **SUMMARY 10. COMMUNITY AND SOCIAL INFRASTRUCTURE**

### **CS2: Enhancement of and Provision for Community Facilities**

Report misses a number of West Mersea Assets, Mersea Museum, Mersea Barrow, Firs Road Burial Grounds, Feldy View Burial ground.

No Data for Mersea Medical situation. The doctors list has been closed since July 2024 but no actual number of patients. Also the Dentist list for NHS patients is full.

The Island has to rely on the several voluntary organisations to provide emergency support for the community. Retained firemen, now about 7 persons.

Lifeboat station requires a large team for launching authorities, launchers and crew.

Auxiliary Coastguard team to coordinate Lifeboat and water incidences.

### **CS3: Education Provision**

#### **Comments:**

Busing of some 400 plus students to two secondary schools with high tides the return trip can be a problem. The buses to TLA are free the other catchment secondary school in Tiptree has to be paid for by the parents.

### **CS4: Sports Provision**

#### **Comments:**

It has to be understood that facilities provided at the WMTC recreation fields, The Glebe, are for Parish use and not a sub centre for CCC sports facilities as the provision has to be maintained at Parish's expense/local council tax payers. Also it has to be borne in mind the problematic access to these facilities with people coming from off the Island due to tidal problems.

The Island does have many sports facilities in the form of private clubs which run by subscription of the members who use same.

### **CS5: Tourism, Leisure, Arts, Culture and Heritage**

#### **Comments:**

*"Policy EN1: Nature Conservation Designated Sites – Development proposals that have adverse effects on the integrity of habitats, designated sites, or Sites of Special Scientific Interest, either alone or in combination, will not be supported."*

#### **Oysters as a Critical Economic and Cultural Resource:**

- i) Native oyster beds in the MCZ are central to local livelihoods, aquaculture tourism, and heritage activities.

ii) Any additional nutrient, chemical, or bacterial pollution from WRC effluent, CSO events, or cumulative housing discharges would degrade oyster beds.

iii) Such degradation would be catastrophic, halting recovery efforts, threatening oystermen's livelihoods, and undermining aquaculture- based tourism, including oyster festivals, seafood experiences, and heritage tourism. **Tourism and Recreational Impacts:**

I) Degraded estuarine and coastal water quality would reduce the attractiveness of bathing waters, beaches, and recreational activities, harming local tourism revenue.

ii) Visitors are deterred by pollution events, bacterial spikes, or visibly degraded coastal environments, which directly impacts hotels, restaurants, and leisure providers.

#### **Cumulative Impacts:**

i) Existing and proposed housing (~600 homes) increase effluent load, with direct implications for oyster beds, estuarine ecology, and tourism.

ii) CSOs and WRC discharges exacerbate risks, particularly during storm events.

#### **Policy Implications:**

i) To comply with CS5, development must protect tourism assets: oyster beds, bathing waters, coastal recreation, and cultural heritage.

ii) Required measures include:

1. Full cumulative assessment of wastewater and CSO impacts.

2. Infrastructure upgrades at the WRC before development occupation.

3. Mitigation measures to prevent degradation of oyster beds, estuarine habitats, and recreational water quality.

#### **Conclusion:**

i) The downgrading or loss of oyster beds would be catastrophic for both Mersea Island and Colchester's economy, tourism, and cultural heritage.

ii) Tourism and aquaculture must be explicitly prioritised in planning and infrastructure decisions.

## **10. COMMUNITY AND SOCIAL INFRASTRUCTURE**

### **CS5: Tourism, Leisure, Arts, Culture and Heritage**

To comply with CS5, development must protect tourism assets: oyster beds, bathing waters, coastal recreation, and cultural heritage.

Full cumulative assessment of wastewater and CSO impacts

Mitigation measures to prevent degradation of oyster beds, estuarine habitats, and recreational water quality.

The downgrading or loss of oyster beds would be catastrophic for both Mersea Island and Colchester's economy, tourism, and cultural heritage.

Tourism and aquaculture must be explicitly prioritised in planning and infrastructure decisions.

## CS6: Caravan Parks (Mersea Island)

### Comments:

This policy now appears to be a generic policy applying to the whole of Colchester whereas under the existing plan there is a specific policy applying to Mersea Island and we believe this should be maintained and reinstated into the new plan as per WMNP Policy WM22

We require this paragraph to be added to The Local Plan under Mersea Island & to comply with the WMNP policy

**The removal of touring caravan/camping sites to be replaced with static caravan sites OR CHALETS will not be supported.**

*The last para of WMNP Policy WM22 but with addition of "or chalets"*

**(Reason: To continue to permit touring vans and campers to visit the Island and use official sites. This also helps prevent indiscriminate use of unauthorised areas, such as the public highways and car parks.)**

*NOTE Copy of agreement with East Mersea PC from the WMNP*

*Appendix 4 - Agreement of Understanding and Cooperation between the West Mersea Neighbourhood Plan Steering Group (WMNPSG) and East Mersea Parish Council (EMPC)*

*1. The aim of this agreement is to establish a good working relationship between the WMNPSG and EMPC. This is essential for the purpose of constructing a Neighbourhood Plan (NP) for West Mersea that will also give due consideration to the community of East Mersea.*

*2. The WMNPSG and EMPC will work closely together on areas where they share a common interest. Examples of this are the caravan parks, tourism, the environment including but not limited to the preservation and benefit of our wildlife, birds, and seawater quality, recreational areas and open spaces. There may be other areas identified as the process develops.*

*3. A representative of EMPC will have a seat on the WMNPSG and will liaise between both community groups. The representative will be included on the distribution for the NPSG agenda, and minutes and will also have access to view information on the NP Google drive. The EMPC representative will share information and data which is available to them in support of the NP.*

*4. Following the adoption of the NP both East and West Mersea Councils may consider it beneficial to have procedures in place to ensure the policies contained within the NP are monitored and complied with.*

*5. This agreement will provide evidence for inclusion in the NP Consultative Statement of how the WMNPSG engaged and consulted with East Mersea Parish Council to shape the development of the NP.*

*Signed by:*

*Cllr Jeff Mason Chairman of EMPC C & Cllr Peter Banks Chairman of WMNPSG*

### Further matters of concern for Caravan Parks on Mersea Island

#### Wastewater Infrastructure Requirement:

- i) CS6 states that any development, change of use, or intensification at caravan parks is only supported where Anglian Water confirms adequate wastewater treatment and sewage capacity.

- ii) On Mersea Island, the WRC capacity is not currently demonstrated for cumulative allocations, including existing Local Plan and Neighbourhood Plan dwellings (~600 dwellings total), as well as caravan park intensification.

#### **Environmental Sensitivity:**

- i) Mersea Island is home to MCZ, SAC, and Coastal Protection Belt designations.
- ii) Additional wastewater discharges from caravan parks, combined with existing and proposed housing, would degrade estuarine and coastal water quality, threaten oyster recovery, and impact bathing waters and tourism.

#### **Policy Implications:**

- i) Without confirmed WRC capacity and mitigation of discharges, development at caravan parks cannot meet CS6 criteria.
- ii) Full cumulative wastewater assessment must include all housing, caravan park expansion, and potential CSO events to prevent adverse environmental and economic impacts.

#### **Conclusion:**

Approving caravan park development without proper wastewater infrastructure risks environmental harm, loss of oyster beds, reduced water quality, and negative impacts on tourism.

## **SUMMARY 10. COMMUNITY AND SOCIAL INFRASTRUCTURE**

### **CS6: Caravan Parks**

This policy now appears to be a generic policy applying to the whole of Colchester whereas under the existing plan there is a specific policy applying to Mersea Island and we believe this should be maintained and reinstated into the new plan as per WMNP Policy WM22

Approving caravan park development without proper wastewater infrastructure risks environmental harm, loss of oyster beds, reduced water quality, and negative impacts on tourism,

## **11. PLACE AND CONNECTIVITY POLICIES**

### **PC2: Active and Sustainable Travel**

#### **TRANSPORT**

#### **Colchester Local Plan Review: Further Transport Evidence 28<sup>th</sup> October 2025**

**2.4 Conclusion,** This chapter has set the scene for the transport analysis impacts from preferred site allocations. It has considered the vision and objectives at national, regional and local levels to provide a framework to guide the assessment of transport issues and mitigation measures in line with NPPF guidance. The chapter has also provided information on the scale of housing and employment growth in the preferred site allocations, which will be additional to reference case growth at allocations within the adopted plan (2017-2033) and at TCBGC. The following chapter (3) introduces the transport model North Essex Model (NEMo), and explains how household and jobs

growth is used to derive BaU growth in trips to input into the model. NEMo outputs are then summarised to understand the BaU unmitigated transport impact of this growth.

**Figure 2.2** Shows West Mersea Site PP23 but does not cover the access route onto Island and therefore in Findings does not show total blockage of the access to the Island because of Tides/sea water covering and blocking the highway (see also para. B.2 below). Is a ferry service to be provided for access ?!

**Figure 4.2** indicates change to Bus Route on Island. This entails the Bus going via Dawes lane to the west of the proposed new development.

Firstly Dawes Lane is not wide enough or suitable to accommodate a Bus (Konectbus state “It is unlikely that we would be able to run buses along Dawes lane due to the junction with East Road being quite tight.” Also the issue of being less than 5.0 metre width in places but more important is disenfranchising all those living/staying beyond Dawes Lane as the bus now goes via Chapman Lane which wider and more suitable route, picking up all those at the east end of West Mersea, Waldegraves Caravan site entrance and Blue Row stop. **This is not a good idea and should be rejected.**

**4.3.1.** Walking access/footway to the village from the PP23 east of Dawes Lane needs to be constructed and upgraded at it's southern end onto East Road. Also the provision of a new footway on the north side of East Road from the development going west to join with the existing footway.

**6.5 Conclusion** does not address total blockage of the B1025 at the Strood Causeway onto Mersea Island for periods of few minutes to possibly 2 to 3 hours or more. This both predictable through tide table reference but also unpredictable due tidal surges both higher and lower actual tide heights.

## **A Policy context supporting the vision-led approach**

### **A.5 ECC Climate Action Plan**

Para 16, 162 & 163 also 170, 171 & 173 of NPPF No mention of Sea Level rise effecting people movement, land sinkage and collapsing seawalls. These development proposals seem to pay little attention to NPPF policies quoted.

### **A.6 ECC Local Transport Plan**

“• people and goods can get where they need to go efficiently and sustainably  
• everyone should have good sustainable access to work, education and training, essential services and leisure activities, wherever in the county they live ”

Not possible with a tidal access road which is impassable at times

### **A.7 Local implementation plans**

“• other sustainable travel measures, promotion and community projects to overcome the challenges and barriers faced by many residents and their perceptions of active travel”

Not possible because of the Strood Causeway

## **B Method for assessing the acceptability of transport impact from preferred site allocations**

### **B.1 Strategic versus detailed**

“Traditional approaches to acceptability of local plan development often focus on using level of service (LoS), volume/capacity (V/C) and queue length indicators around junctions. At the preferred options, plan making, Regulation 18 stage of local plan preparation there is risk that sole use of these indicators would tilt plans to highway schemes at the expense of the vision for sustainable

transport; and put focus on specific problem locations while losing sight of the strategic tapestry of the transport network, and the cumulative impact of how people and goods move through the network using all modes. At the Regulation 19 stage and in site-specific, developer-led transport assessments, LoS, V/C and queue length indicators have their role – ideally when used to test the effectiveness of mitigation measures to strike the right balance between pedestrian, cycle, bus, car and goods vehicle movements aligned with a sustainable transport vision. It is also appropriate that they are considered at key junctions such as found on the strategic road network managed by National Highways (NH). However, at the Regulation 18 stage, a more strategic approach is recommended, aligned with the intent of the NPPF and the draft LTP4. “

## **B.2 Assessment of keeping people and goods moving (theory and method)**

For Mersea Island there is no mention made of complete blockage of B1025 due to tides covering the road and making it impassable, Queuing traffic can be an issue with some 600\* vehicles an hour movements both on and off the Island.

\* Last monitoring for Present Local Plan 2021/2033 indicated some 7500 vehicles coming onto the Island and also 7500 vehicles off the Island between 0700hrs and 1900hrs. Of which 1870 come from using the Lower Road Peldon.

WMTC request that traffic survey count it carried out at The Strood B1025 to properly asses the present traffic numbers.

This year 2026 the tide during the day time is predicted to be over 5m on 102 occasions covering the period from approx. 1030hrs to 1630hrs. WMTC understood that Firstbus did not run to Mersea when the high tide is predicted (to be 5m +) but the bus will not go as far as Mersea for a period of up to 3 hrs.

This practice shows that the bus timetable and actual running of the bus could be affected during any period covering from approximately 1000hrs in the morning till approximately 1700hrs in the evening. The Firstbus electronic board ( run by CCC) at the Colchester lay-by bus station does not usually reflect the actual bus cancellation or delays. At the Mersea end there is no announcement boards and the web site is seldom updated.

Firstbus has advised that at the periods of High Tides the buses will be diverted and stop at Peldon. However Konectbus (Seasiders) who run the other service are only contracted by Essex County Council to provide a service to Peldon, presumably their coming onto the Island is for commercial reason. If ECC is abolished in a couple of years will the new Unitary Authority finance this Peldon service and onto Mersea. The company has stated “Our policy on high tides across the Strood is to leave 45 minutes on either side of a high tide to allow the road to clear before we send any buses over.” What they do not state is the issue of traffic build up which can also snarl up vehicle movements on and off the Island.

Firstbus provide an about Hourly service to and from West Mersea to Colchester from 0642 till 2310 i.e. some 17 buses per weekday and Saturdays and two hourly Sundays some 7 buses. The evening 4 buses are supported by Essex County Council. Konectbus provide a service to Colchester via the B1025 via Peldon about 5 buses a day from 0937 till 1637hrs.

This does not also take into account the stoppages due to the unpredicted tides being above 5m+, and therefore Public Transport on and off the Island is totally unpredictable and unsatisfactory state of affairs.

The queuing traffic is also a nuisance to business for deliveries and access of staff.

## B1025 ACCESS ROAD TO MERSEA OVER TIDAL CAUSEWAY KNOWN AS THE STROOD

Mersea is situated at the end of the B1025, its only access roadway, which crosses a tidal causeway and needs serious consideration. The roadway is covered by seawater when the tides are predicted to be 4.65m or higher above chart datum. Tides of about 5.9m. which is some 1.25 m of water above the road surface. Weather and atmospheric conditions can increase or decrease the coverage both in time and height. The road can be wet for just a few minutes or impassable for up to 3+ hours. In the worst case such as 5/6<sup>th</sup> December 2013<sup>1</sup> when there was double surge at high tide, this tide was only 30mm less height than the 1953 disaster East Coast flood height at Mersea ( <sup>1</sup> Earth Science Review southern north sea storm surge). The bigger/higher tides occur around midday and midnight, that is twice every twenty four hours. During busier holiday times the mainland side traffic can back up over 4 to 5 kilometres. The CCC's own Sustainability Report states that climate change is likely to cause increases in tidal surge heights of between 97mm and 115mm. Also the land is sinking at the rate of 1mm per year during the twentieth century. During the periods of the higher tides the Fire Service deploy onto the Island an extra Fire vehicle to back up the local retained Fire service on the Island (When tide predicted to exceed 5.2m). The Emergency services do have contingency plans for evacuation of casualties from the Island, which does take place on a regular basis. The B1025 is also near/below sea level were it crosses Pete Tye common some 300 metres from the seawall off the Pyefleet channel. This seawall was topped and breached in the 1953 flood and the roadway here remained covered and impassable for many days. The Government has indicated any future developments should not be situated in areas vulnerable to flooding. Whilst very few houses on the Island are liable to flooding, however the only access to the Island does flood on a regular basis through out the year.

The Causeway onto the Island would need to be raised to 6.5 metres above Chart Datum (4.5m above OD) to ensure the unlikely coverage by the sea. This would require 1.65 Km of road to be raised by some 2 metres, whilst still keeping access to the Island open at most times. The present Causeway construction is not substantial having grown by addition of material since Saxon times, and any large storm tidal surge may easily overwhelm and breach the roadway which is only protected by some stones placed either side, last done some years ago. Any road works through this sensitive protected area would also be an issue.

The Essex County Council has installed physical tide gauges at either end and in the middle which show depth of the water when you reach them! There are notices either end of the causeway stating "Danger when tide covers the footway" hardly explicit as to the issue that vehicles will likely get stuck if the water is too deep and salt water will seriously damage the vehicle as it is so corrosive to metal, electrics/electronics, brakes and wheel bearings.

It is an ongoing problem for all 999 services as they regularly being called to the Strood to help stranded motorist and people trapped in vehicles as the tide rises around them and sometimes the vehicle floats.





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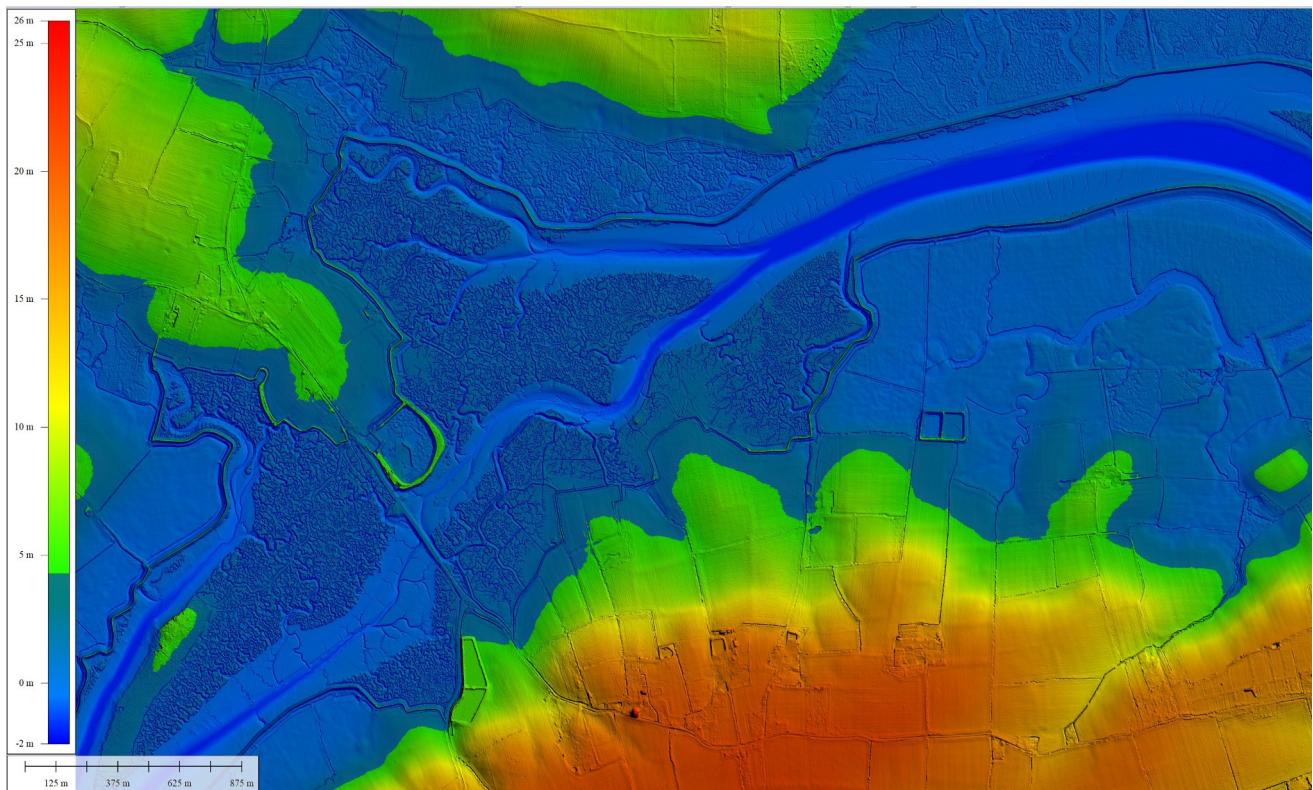


The main Colchester-Mersea road was impassable for most of this week at Pete Tye, where the water returned to the site of a bridge long since disused.

Newspaper cutting Essex County Standard February 1953

Lidar Display map from Environment Agency in 2022  
4.30m Above Ordnance Datum Network Digital Terrain Model.jpg from EA

The Blue area is the area below 4.3m OD



This Lidar map above shows the equivalent area flooded (coloured Blue) in 1953 when the tidal surge was approximately 4.3 metres above Ordnance Datum or 6.9 m Chart Datum high tide. (*Chart Datum is approx. 2.61m below Ordnance datum (Newlyn). The uncertainty associated with this value in the model is  $\pm 0.07m$* ). Note that a lot of the mud/earth seawalls are now under water which would indicate that since being built after the 1953 flood the Lidar map indicates have now slumped in height. This should raise questions about how the flooding data has been prepared. Also the original height of the seawalls was to meet a requirement of a 1 in 100 years “event” back in 1953. However we now know that sea level rise is increasing by some 2 now 4mm per year, added to which the land is sinking in the Southeast at approx. 1mm per year and therefore an “event” must be more imminent.

As with the B1025, main roads in West Mersea follow historic tracks being similarly narrow in parts as is normal for rural village locations that have developed into small towns. These roads are just Adequate for the existing population but are not during the summer months when the population can more than double due to the number of visitors, caravanners and campers. (under caravans it shows the number of Caravan tourist on an August Bank Holiday weekend can increase the population to some **13,000+-**) The current static population being approximately 7220 (2021 census data) and to which must be added those visitors from the surrounding areas that is East Mersea, Peldon and Langenhoe, these being distinct from “holiday” visitors. As a result of this influx of all types of visitors, especially during the summer months there is considerable congestion and parking is at a premium.

There is no secondary school on the island. The nearest secondary schools are Thomas Lord Audley School in Colchester at 12 Km and Thurstable School in Tiptree at 19 Km. Transport facilities for pupils are therefore important. Transport to Thurstable and other schools except Thomas Lord Audley involves a cost to parents. There is no direct link from West Mersea to Tiptree and special buses are currently required for pupils attending the Thurstable School.

For pictorial information regarding West Mersea see Google map under (amended) showing the

B1025 route to Colchester, together with the approximate position of the main line railway station and hospital to the north and to which can be added the Park and Ride location.

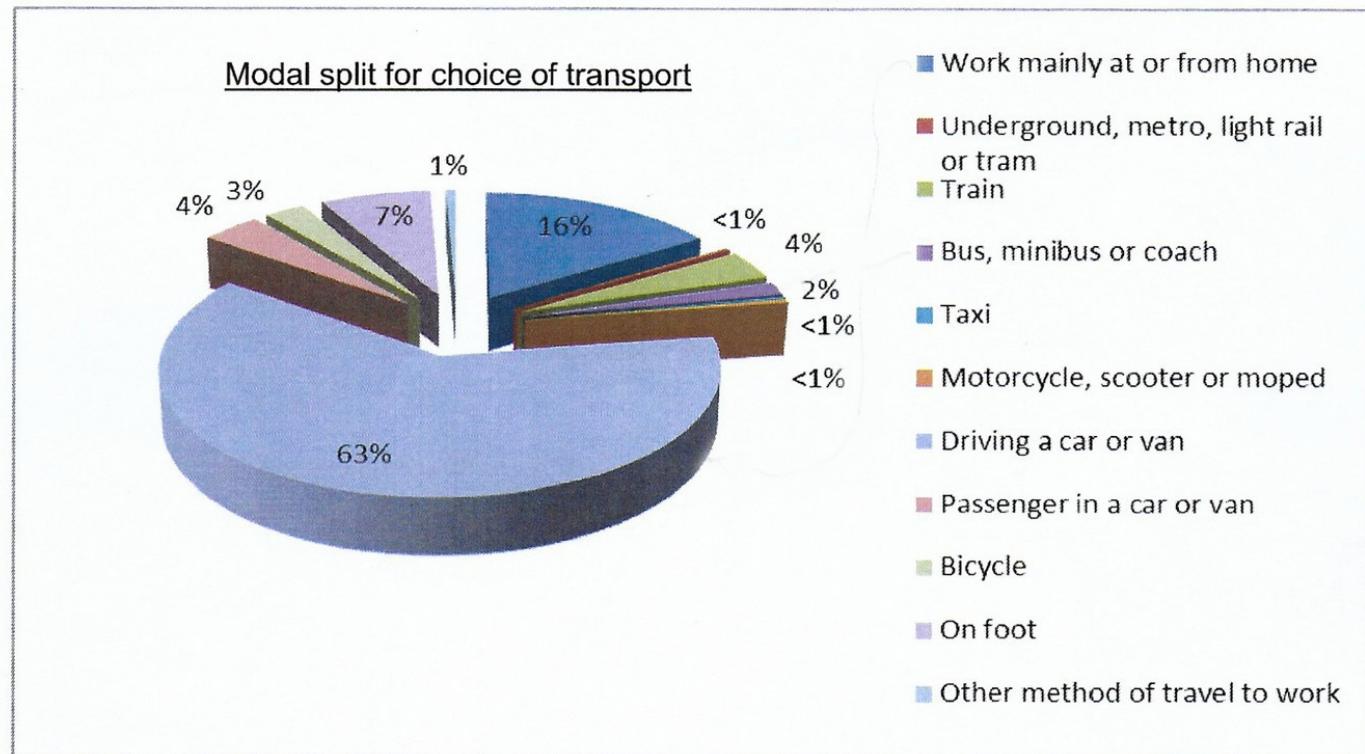


The importance of the B1025 cannot be overestimated, and despite the possibility of being criticised for repetition, whilst West Mersea has certain local facilities, other facilities, for example secondary schools, hospitals, major shops, main line railway services, major sports facilities, swimming pool, all require a journey to Colchester (or Tiptree). Colchester is some 8 to 9 miles away (approx. 13km). It is because of these that transport facilities are so important.

The Office for National Statistics shows that of 3,183 persons who go to work from West Mersea.

# West Mersea

## Workplace zone 21



To:	From:	West Mersea	%
West Mersea	West Mersea	588	18
Castle		280	9
Greater London		170	5
Tendring District		100	3
Braintree District		82	3
No fixed workplace		358	11
Other Locations		1101	35
No journey		504	16
Total		3183	100

The use of Public Transport is low, 7% compared to 67% driving, or passenger in a car or van. (Colchester 61.1%).

A recent Public Transport review reported that only 15% of traffic was commuting 85% was local out of town shopping, school runs and pleasure. The possible reason for this is obviously one of convenience but also due to the lack of and unreliability of the local bus service together with higher cost. With a more frequent bus service, lower cost more travellers may use public transport but these improvements cannot overcome the unreliability of the service because of the High tides on the Strood crossing.

It is also noted that journeys made from West Mersea taken from the same source, Office for National Statistics, highlights the lack of employment opportunities in West Mersea. A situation that is unlikely to improve and which will increase the strain on existing travel facilities due to new

residents having to travel off the Island to find employment. In any infrastructure the movement of people and goods is important and frequent transport facilities are needed in any large development. This is hardly a frequent bus service as suggested in Colchester's original plan. Additionally when the causeway is flooded buses terminate in the adjoining village of Peldon which is some 6 kilometres from the centre of West Mersea. Therefore in these circumstances West Mersea has no bus service. A monthly notice used to be issued by the bus operator showing the buses that were cancelled during the month ahead in 2016. Note these buses are cancelled due to predicted tides and not on weather and actual water conditions which may further affect the ability to cross. However this practice has since ceased.

#### **Traffic Distribution from the Evidence Base Further Transport Evidence October 2025**

4.8 The following residential development traffic distribution for has been agreed with ECC during the pre-application process.

4.9 It is considered that the main desire line for vehicular traffic during the AM and PM peak periods is towards Colchester i.e. departing Mersea Island. The 2011 Census Data has been examined for West Mersea (Mid Layer Super Output Area – E02004526) to establish the distance that residents travel to work. The Census output report is attached at **Appendix K** and is summarised below:

- **Less than 2km 24%**
- **2km – 5km 4%**
- **5km – 10km 5%**
- **10km – 20km 46%**
- **20km – 30km 4%**
- **30km – 40km 6%**
- **40km – 60 km 2%**
- **Over 60km 10%**

4.10 For the purpose of this assessment it is considered that all work that requires travelling (i.e. not working from home) under 5km are on Mersea Island and all work destinations over 5km are not on Mersea Island. Therefore, around 29% of commuting trips are on Mersea Island and 71% of commuting trips are off Mersea Island.

4.11 In addition, the 2011 Census data has been examined to determine the method of travel to work for West Mersea. The results are attached at **Appendix K** and summarised below:

- **Train 5%**
- **Bus 2%**
- **Taxi 0%**
- **Motorcycle 0%**
- **Driving a car / van 74%**
- **Car passenger 5%**
- **Bicycle 3%**
- **Walking 9%**
- **Other 1%**

4.12 Due to the nature and location of West Mersea car usage is the predominant mode of travel for commuting journeys. This indicates that the majority of people who work away from Mersea Island (71%) will travel by car whilst some people who work on Mersea Island (East Mersea for example) will also travel by car, although walking and cycling to work (12%) is high and can therefore be encouraged through good design and sustainable development location.

4.13 However, not all vehicle movements from residential developments during the peak hours are commuting journeys. Some journeys are associated with taking children to / from school, shopping and leisure and these will primarily be journeys undertaken on Mersea Island.

The school run noted above should also apply to secondary and higher education OFF the Island. From the WMNP Residential Survey in 2019, in which 656 residents responded, we know that nearly 28% of residents responding did a daily journey across the Strood and back with 0.3% using a bicycle. The survey also showed 19% used a pedal Bicycle as their most regular means of transport on the Island. Only some 6.5% use the bus daily of whom 61% had senior citizen bus passes with 90.5% walking to the bus stop.

The other issue that needs consideration is the evacuation of the Island in case something goes wrong with Bradwell Nuclear Power station, either from the existing mothballed site or from any new Modular Small Reactors proposed for the existing nuclear sites, such as Bradwell. Below the

*"Secondly, small modular reactors offer a huge industrial opportunity for our country, and we are determined to harness Britain's nuclear expertise to win the global race to lead in this new technology. I can inform the House that following a rigorous two-year competition, today Rolls-Royce SMR has been selected as the preferred bidder to develop the UK's first SMRs, subject to final Government approvals and contract signature. This initial project could create up to 3,000 skilled jobs and power the equivalent of around 3 million homes.*

*In the spending review, we are committing to the public investment needed to get the SMR programme off the ground, with more than £2.5 billion in funding over the period. The project will be delivered by Great British Energy Nuclear, a publicly owned company headquartered in Warrington—an allied company to Great British Energy, which is headquartered in Aberdeen. Subject to Government approvals, the contracts will be signed later this year. Our aim is to deliver one of Europe's first SMR fleets, leading the world in the nuclear technologies of the future, with more good jobs and energy security funded and made possible by this Labour Government.*

## BRADWELL

### NPPF Policy 162 &172, 178

These policies deal with the need to take account nationally significant infrastructure, mitigation of major hazards and consequences of major accidents. Also across local boundaries co-operation. We do not believe that these policies have been fully taken into consideration within the DLP and therefore conclude the plan is unsound. In February 2015 Maldon District council replied to a cross boundary questionnaire as following:

*"There will be implications for Maldon from proportional settlement growth at Tiptree and West Mersea which are settlements close to the boundary with Maldon DC. This issue should be elaborated upon going forward and we would be keen to work with Colchester on the plans for growth in these towns as they emerge."*

*We are not aware that further consultation on the expansion of housing and caravans has taken place and we at Mersea are concerned because Maldon DC has a policy D4 in which the last Paragraph states "The Council (MDC) will strongly support the principle of the development of a new nuclear power station at Bradwell-on-Sea." Colchester Council is opposed to a new nuclear power station at Bradwell.*

In 2013, the ONR has accepted a report that there are no longer any reasonably foreseeable events which could lead to a radiation emergency with off-site consequences which require the local authority to maintain an off-site emergency plan the ONR assessed this and concurred with these conclusions.

However the site still has an active nuclear waste storage facility which is vulnerable to both flooding and any hostile action.

In October 2016 GNF, a joint venture between China General Nuclear Power Corporation and French firm EDF, submitted a Generic Design Assessment for the UKHDR100 nuclear technology. The assessment process is expected to take five years. If the Office for Nuclear Regulation and the Environment Agency approve GNF's application, it will mark the next step forward in securing planning permission to build the plant.

Any further Nuclear Power station at Bradwell will lead to a potential increase in risk of a radiation emergency particularly to the community of Mersea Island which is in the prevailing direction of the and down wind of the Bradwell site by some 4Km across the open water.

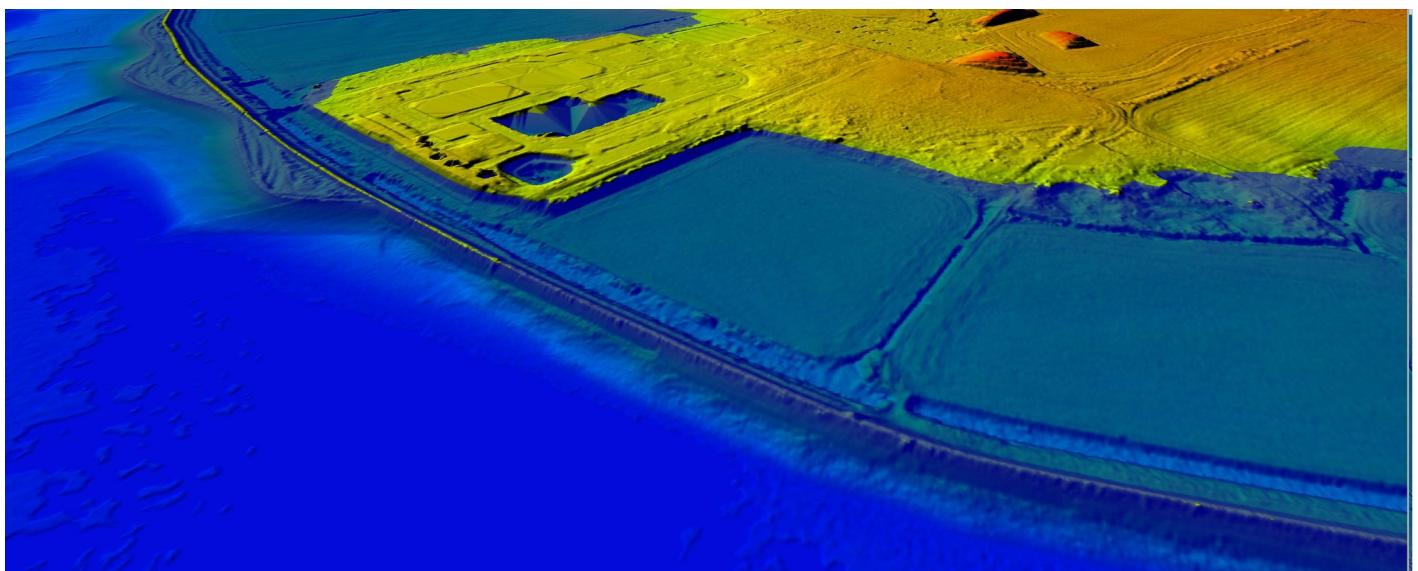
It is logical for the Colchester Borough Council to anticipate such an occurrence and urgently create an updated off-site emergency plan. It is axiomatic that any emergency plan must include comprehensive and well thought out proposals for the mass evacuation of the entire population of

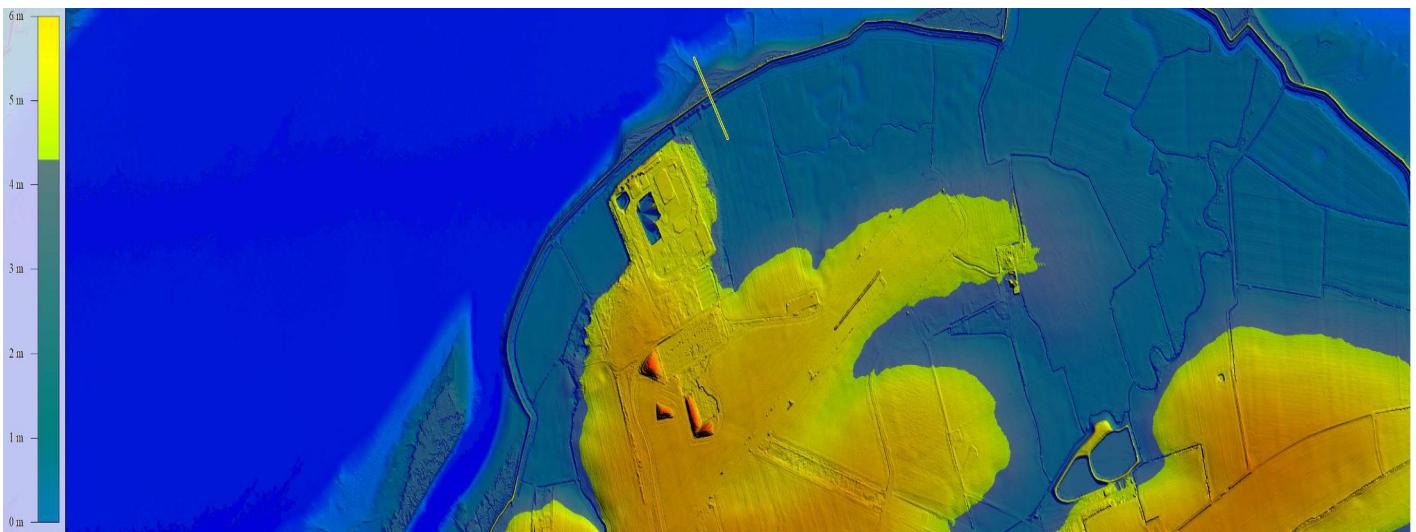
Mersea Island, via a single two lane highway regularly flooded at high tides.

Before any consideration can be given to any planning proposal (which if granted will result in a substantial increase in the population of Mersea Island), the Secretary of State must be in a position to review Council's off-site emergency plan specifically in relation to a radiation emergency and the inevitable off-site consequences. If that plan is not now in place, any suggestion of the inclusion of the 300 homes within the emerging Local Plan would be premature.

The Office of the Nuclear Regulator (ONR) has stated that the revised Sizewell off-site Emergency Plan will require the priority evacuation of holiday makers. This should be followed in any future planning of evacuation plans.

LIDAR MAP @ +4.3m ODN showing the area around the existing power station and store. Here again one can see the topping of the seawalls around the site and the flooding it causes.

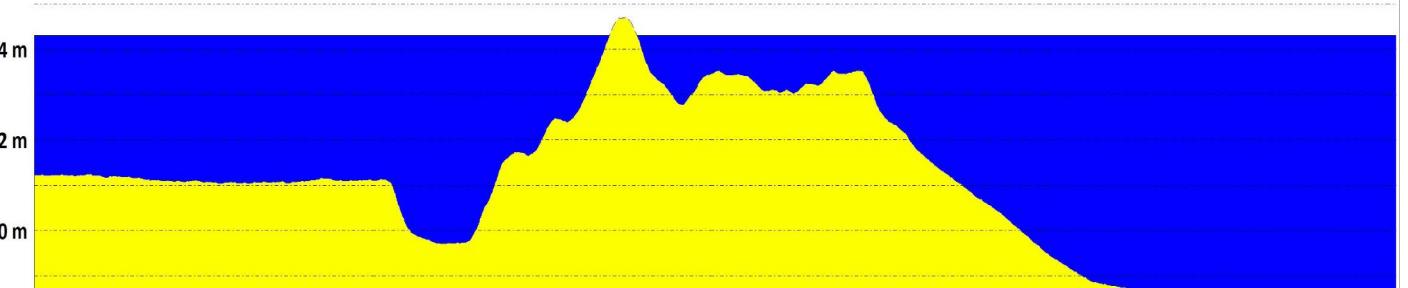




From Pos: 600400.444, 208984.014 To Pos: 600271.367, 209199.398



From Pos: 601742.348, 209363.208 To Pos: 601591.059, 209573.637



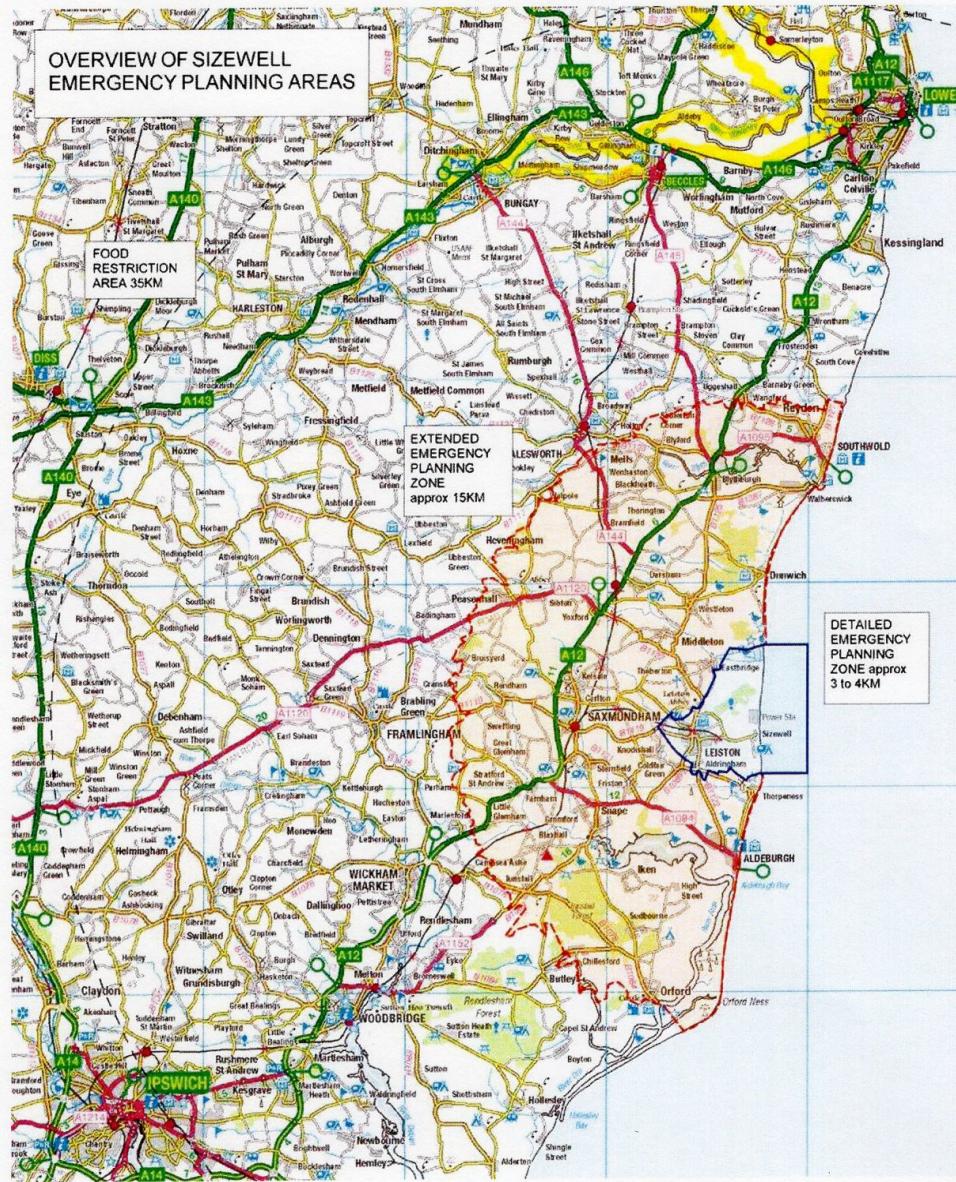
Below are details from the Sizewell/Suffolk Emergency Plan:

**NOT PROTECTIVELY MARKED**

Sizewell Off Site Emergency Plan

Issue 3.5 dated Feb 17

An overview of Sizewell Emergency Planning Zones can be seen on the following map:



**10. Concurrent Risks.**

The Suffolk Community Risk Register identifies the following risks that may affect the implementation of this plan if they occur at the same time as any nuclear emergency:

**10.1 Flooding.** Certain weather patterns, in particular low pressure systems in the North Sea, can exacerbate the effect of high tides by generating a tidal surge on top of the predicted high tide level. The Sizewell site is located above the

Below is the map showing Mersea Island with the Sizewell DEPZ superimposed on top, in green, and the 2.4 Km radius, in red, is also shown.

Below are extract of details from the Sizewell Emergency Plan.



*The ONR revised the Sizewell Detailed Emergency Planning Zone (DEPZ) in April 2014. The revised area is a land component based primarily on 6 figure postcodes located around a circular radius of approximately 2.4km with an extended boundary that includes the town of Leiston and part of the village of Aldringham. A rectangular seaward component commences at the points where the land component reaches the coast and extends 2km out to sea*

*1 . Countermeasures within the DEPZ are pre-arranged/issued for immediate implementation for certain identifiable groups within 1km from the site. All identifiable groups within the DEPZ are provided with prior information.*

*25.3.3 Evacuation. Where the risk to public health posed by an off site release of radioactive contamination is predicted or has been identified through radiation monitoring to be beyond the short term protection which sheltering affords, the SCG on advice from the STAC may decide to evacuate areas around the site. Detailed evacuation arrangements for the DEPZ are at APPENDIX K and the Police will take the lead in implementing any evacuation action. Areas advised to evacuate will be identified by post codes. The MCC will lead on communicating evacuation arrangements to affected people.*

*Evacuation is not automatic on declaration of an Off Site Nuclear Emergency and will only be used where radiation monitoring and modelling has identified a potential risk to public health that requires people to be moved in order to avert effective dose of at least 30mSv.*

However, people using the beach and occupying the Beach View Holiday Park will be advised to immediately evacuate by the Police due to being afforded less protection than more substantial dwellings.

*DEPZ - Where evacuation is required in the DEPZ, this will be communicated via TV and radio and will make use of the NOT PROTECTIVELY MARKED Sizewell Off Site Emergency Plan Issue 3.5 dated Feb 17 29 NOT PROTECTIVELY MARKED evacuation arrangements provided in prior information. Further detail on evacuation arrangements is at APPENDIX K. EEPZ - Where a risk to people beyond the DEPZ is predicted, the STAC may advise the SCG to evacuate certain sectors to avert dose. This advice will be passed via radio and TV.*

Once a Nuclear Emergency has been declared it difficult to understand how the visitors and caravanners will be evacuated first, potentially many thousands, before the inhabitants. If the emergency is broadcast or on the internet surely the whole Island will want to evacuate and without military control in place very quickly the scene could turn very nasty.

## **11. PLACE AND CONNECTIVITY POLICIES**

### **PC2: Active and Sustainable Travel**

Indicates change to Bus Route on Island. **This is not a good idea and should be rejected.**

The plan does not address total blockage of the B1025 at the Strood Causeway onto Mersea Island for periods of few minutes to possibly 2 to 3 hours or more. This both predictable through tide table reference but also unpredictable due tidal surges both higher and lower actual tide heights. The importance of the B1025 cannot be overestimated due to all residents having to travel off the Island to find employment. All secondary education is off the Island.

## 12. PLACE POLICIES

Comments:

### PP23: Land East Dawes Lane, West Mersea

Should this development proceed we make the comments below

*In addition to the infrastructure and mitigation requirements identified in Policy ST 7 and subject to compliance with all other relevant policies, development will be supported on land within the area identified on the policies map which provides:*

1. *Approximately 300 new dwellings of a mix and type of housing to meet evidenced needs and which is compatible with surrounding development;*
2. *Safe and suitable site access to required highway design standards and a singular point of vehicular access to be agreed with the Highway Authority which demonstrates that the proposal would not be detrimental to highway capacity or safety;*
3. *A safe pedestrian access to ensure connectivity within and throughout the site to existing footways and any Public Rights of Way. Ensure provision of green infrastructure connections and recreational access to the countryside, and The Glebe, also securing active travel links and connections to the settlement, including to the district centre;*

*Footways from the site down to East Road must be upgrade for safe access. Also any pedestrian access onto East Road from the site will require a new footway to be provided from the site join the existing footway ending opposite the Fox public house.*

4. *Screening comprising locally appropriate tree belts and/or hedgerows will be required along the site boundaries to ensure that development is sensitively integrated into the landscape to reflect and reinforce rural character;*
5. *Enhanced provision of open space of at least 5 hectares must be provided within the site and this open space must link with the open space within the approved scheme at Dawes Lane and connect through to The Glebe as indicated on the policies map;*

*NOTE: This development's open space which should be the north of the developed area and should be left within the CPB designated area so that no further development of site may occur at a later date.*

6. *Contributions towards the enhancement of the quality and value of The Glebe Sports Ground and facilities.*

*Yet to be agreed with WMTC and further considerations for Section 106 monies will be required by WMTC.*

7. *Provision of allotments to be transferred to West Mersea Town Council to manage and maintain*
8. *Native hedgerows and grassland within the site should be retained and enhanced with any loss of grassland compensated within the site. BNG measures should include enhancing retained grassland, establishing new grassland and native hedges, and new tree planting;*
9. *Support will be given to delivering standing freshwater habitat within or adjacent to the site to support the delivery of the strategic creation opportunities in the Essex LNRS;*

10. Development must conserve, and where appropriate, enhance the significance of heritage assets (including any contribution made by their settings). Designated heritage assets close to the allocated site includes six Grade II Listed Buildings and one Scheduled Monument as informed by the stage 1 HIA;

11. Demonstrate adequate capacity for managing wastewater including proposed phasing requirements or alternative solutions to the satisfaction of the Council and Anglian Water;

#### Cumulative Infrastructure Concerns:

- i) The allocation for ~300 new dwellings must be considered in combination with existing Local Plan and Neighbourhood Plan housing (~280 dwellings).
- ii) Cumulative wastewater discharges from all these dwellings, along with any caravan parks or other developments, risk exceeding WRC capacity and contributing to CSO events.

#### Environmental Impacts:

- i) The site drains into sensitive estuarine and coastal habitats, including MCZ (native oyster beds, intertidal sediments) and SAC.
- ii) Without mitigation, nutrient, bacterial, or chemical loading from development would threaten recovery of protected features and compromise bathing water quality, impacting both biodiversity and recreation.

#### Economic and Tourism Implications:

- i) West Mersea relies on aquaculture, oyster tourism, and coastal recreation.
- ii) Pollution from additional dwellings could degrade water quality, undermine oyster recovery, and reduce tourist visitation, creating direct economic harm.

#### Policy Compliance:

To meet PP23, ST7, and other relevant policies (LC1, LC3, EN3, ST2/ST3, NZ3, CS5, CS6), the following are required:

1. Full cumulative assessment of wastewater impacts including WRC and CSO contributions.
2. Confirmation of WRC capacity before occupation.
3. Mitigation measures to prevent adverse effects on MCZ/SAC features, oyster beds, bathing waters, and tourism assets.

#### Conclusion:

Development cannot proceed without addressing cumulative wastewater capacity and environmental impacts. Failure to do so would undermine the soundness of the Local Plan and jeopardise both ecological recovery and the local economy.

12. A range of measures in addition to prioritising SuDs (Policy EN8) and water efficiency measures to reduce the risk on impact on the WRC capacity as a result of planned growth including:

- i. Removal of unrequired network flows;
- ii. Targeted education to include new residents of the development;

Rather than targeted education for water usage it would be better that water saving measures are employed within the construction of the development, such as dual flushing toilets, and no power showers and all dwellings to have metered water supply. These will also help in iii) below.

*iii. Reduction in the demand for potable water.*

13. Any site specific infrastructure requirements from the IDP (likely to include education provision, highway mitigation, water and wastewater and specific community / open space provision).

14. Before granting planning consent, wintering bird surveys will be undertaken at the appropriate time of year to identify any offsite functional habitat. In the unlikely event that significant numbers are identified, development must firstly avoid impacts. Where this is not possible, development must be phased to deliver habitat creation and management either on or off-site to mitigate any significant impacts. Any such habitat must be provided and fully functional before any development takes place which would affect significant numbers of SPA birds.

All development Proposals within West Mersea Parish, will also be determined against the policies in the West Mersea Neighbourhood Plan (adopted October 2019) Neighbourhood Plan where they are up to date and relevant.

However the new Local Plan drives a cart and horse through the adopted Neighbourhood plan which was signed off in 2022 and runs till 2033. This whole area was in the Coastal Protection Belt!! Therefore there seems to be little point in producing a Neighbourhood plan if a new Local Plan is produced every 5 years which can then override its provisions by demanding more housing development than was in the WMNP and outside the development area of the Parish in CPB land.

*Policy CS1 states in a) An alternative, equivalent community facility to meet local needs is, or will be, provided in an equally or more accessible location within a minimum walking distance of the locality (800m or the minimum distance based on that appropriate for the facility being provided as set out in the relevant evidence*

The Primary school is 2.1 Km

The secondary school in Colchester TLA is 9.5Km however the other secondary school used is at Tiptree called Thurstable which is some 13.2Km distance.

The GP practice/ Medical Centre with Dentist is 2.06 Km

Distance to village centre is 2.51Km

These distances do flag up that this site is very distant from important services and well over the recommended 800 metres, also see below about the difficulties with public transport.

*States “frequent bus routes” (Sustainability Consultation (feb 2025 separate document)*

How can this be correct when there is predictable and unpredictable blockages to the only access road B1025 onto the Island because of high tides which impedes the bus route. (see in infrastructure details). If the bus can not get onto the Island there will be no service within the Island, and this could mean no buses for several hours.

*Infrastructure requirements to 2041 3.9.3.*

*The PPOSS describes range of stated ambitions and proposals for expansion or refurbishment of existing facilities, as well as installation of new playing pitches, at the following locations:*

The Glebe (West Mersea): potential site for installation of new 3G pitch;

However WMTC has concerns of ongoing maintenance cost for looking after any such installation falling upon the Parish Rat

## **SUMMARY 12. PLACE POLICIES**

### **PP23: Land East Dawes Lane, West Mersea**

Development cannot proceed without addressing cumulative wastewater capacity and environmental impacts. Failure to do so would undermine the soundness of the Local Plan and jeopardise both ecological recovery and the local economy.

## **14. APPENDIX**

### **CORRECTIONS AND UPDATES TO CONSULTATION DOCUMENTS**

Site map for West Mersea still not showing whole parish area i.e. north side of parish/island.

#### **COMMENTS ON VARIOUS PARTS/SECTIONS OF CONSULTATION DOCUMENTS**

1. *Settlement Evidence (2024) pages 194 Green network and Waterways Map Layers and map*  
Why no Mersea Layers when the other urban and large Parish areas that have their own dedicated markings?
2. Caravan sites marked on map but no “KEY” page 333/852 Also is the RAMSAR colour code on KEY the same as on the map for Mersea?
3. Query the green marking on the north side of Barfield Road opposite the Cemetery, this is the car park for the Catholic Church adjacent.
4. As site map for West Mersea (page 367/852) does not cover whole Parish on the northern side of the Island the Barrow Ancient monument not shown.
5. Why has the Coastal Protection Belt (CPB) / Settlement Boundary for West Mersea been moved northwards to include the green Open Space of the proposed development area on the East Side of Dawes Lane. Whereas the land on the west side of Dawes Lane, the Kingsfield Development, green space is outside the Settlement boundary as it should be.
6. If Firs Road main Cemeteries are shown as Green Space should also Feldy View Cemetery not also be shown as a green space.
7. Land at Dawes Lane PP23 . The settlement boundary should surely go around the actual development are coloured red on the interactive map, This would then match the Kingfield development on the west side of Dawes Lane now under construction.
8. The Water Treatment Works at the bottom of Cross Lane should be shown/indicated on the map. Also it needs a nomenclature in the table
8. Health Check Review by cpw planning:  
Only one bakery

More than one public house - (Licensed establishment open to the public, serving alcoholic drink.) at least four  
Single butcher and no greengrocers  
Mersea has an accredited Museum  
Empty shops anything from 5 to 8 at any one time  
Well served by Bus stops is okay, but **not** regular buses  
Barrier to Business investment should mention remote access and road connection because of the Strood Causeway

## **SUSTAINABILITY APPRAISAL (Feb 2025 separate document)**

### **West Mersea – Dawes Lane and Brierley: No MCZ Consideration and Cumulative Impacts.**

The original Dawes Lane and Brierley allocations were approved without any consideration of the Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (MCZ act dated 2009), despite proximity and potential functional links to protected intertidal and estuarine habitats. The Sustainability Appraisal and Emerging Allocations Biodiversity Assessment (Colchester City Council, 2024–25) fail to address this omission. The Strategic Biodiversity Assessment (Jan 2025) confirms that irreplaceable and Priority habitats (Section 41, NERC Act 2006) must always be protected from harm. The Plan now proposes an additional 300 dwellings at Dawes Lane, increasing total development pressure in West Mersea to approximately 600 dwellings, yet the SA continues to treat the sites in isolation, without cumulative or in-combination assessment, contrary to SEA and Habitats Regulations. Additional development increases load on the West Mersea Wastewater Recycling Centre (CSO), creating pathways for likely significant effects on the MCZ, SPA, Ramsar site, and SAC. The Plan should therefore explicitly assess the MCZ, cumulative impacts, and CSO/wastewater effects, and reconsider whether the scale of development is consistent with SA Objective 8, Biodiversity harm scoring, and statutory obligations.

## **SUMMARY SUSTAINABILITY APPRAISAL**

### **(Feb 2025 separate document)**

No MCZ Consideration and Cumulative Impacts of this Plan now proposing an additional 300 dwellings at Dawes Lane, increasing total development pressure in West Mersea to approximately 600 dwellings. Appraisal and Emerging Allocations Biodiversity Assessment (Colchester City Council, 2024–25) fail to address this omission. Yet the SA continues to treat the sites in isolation, without cumulative or in-combination assessment, contrary to SEA and Habitats Regulations. Additional development increases load on the West Mersea Wastewater Recycling Centre (CSO), creating pathways for likely significant effects on the MCZ, SPA, Ramsar site, and SAC. The Plan should therefore explicitly assess the MCZ,