

STOP 350 expresses concern over the number of dwellings being proposed by the Garden Communities and the effect it will have for tourism on Mersea Island. The number of dwellings proposed for the period 2017 to 2033 is 15,063 of which 2600 will be provided by an initial commitment from the Garden communities. The West Garden Community is proposed to bring up to 24,000 and the East Garden Community up to 9000 a total of some 33,000 dwellings. The grand total that is planned for this area is 45,463 dwellings which @ 2.3 person per unit equates to 104,565 people. At present the CBC population given for 180,281 in 78,383 dwellings. This is a 58% increase in the area population going forward. This assumes the garden communities will take ALL future development going forward from 2033. However there will be additional land available in Colchester from surplus MOD land as well as any/many other windfall sites.

The consequences of this large increase in population has not been fully considered by the Local Plan or CBC on the coastal and beach areas of the Borough, and particularly upon Mersea Island, being the nearest to these communities.

In Colchester PPG 17 Open Space, Sport & Recreation Study Final Report November 2007 (still a current document) it states in Appendix L Summary of Consultation Results. Para.1.2 Open Space Usage Frequency - Beaches and Coastal areas: 13% stated that they did not use these areas whilst of the other 87%, 42% stated they used this area more than once a month and 45% less than once a month. So with an increase 58% in the CBC population expected that would mean potentially a large proportion of the 91,000 extra people visiting Mersea Island.

Natural England July 18th 2017 part response to CBC on the Local Plan

“As we previously advised, although screened out as individual allocations, all of the allocations need to be considered cumulatively as a collective whole plan housing figure within the zone of influence of European sites. In line with the part 1 AA, we advise that the total net increase of dwellings from the part 2 allocations, cumulatively, will have an adverse effect on integrity (in the absence of mitigation). Therefore the Recreation Avoidance and Mitigation Strategy (RAMS) will need to apply to all housing allocations coming forward, within the respective zone of influence for each European site”.

Under NPPF para 7. an Environmental role – contributing to protect and enhancing our natural, built and historic environment: as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Also NPPF para. 105 - In coastal areas, local planning authorities should take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone Management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes.

& para. 126 – Conserving and enhancing the historic environment.

Along with para. 132.

Colchester Borough Council Publication Draft Local Plan (Regulation 19) – Section Two Habitat Regulations Assessment Report June 2017. Page 39 Natural England reference to ENV1:

“ 5.4 Following completion of a Habitats Regulation Screening Assessment it was concluded that proposals in the Wivenhoe Neighbourhood Plan when considered in combination with development proposals in Section 1 and some development proposals in Section 2 of Colchester’s Local Plan, (development proposals on Mersea Island) had the potential to result in a significant increase in recreational disturbance on the Colne and Blackwater Estuaries, The Habitats Regulations Screening also concluded that proposed growth in Langham could significantly affect water quality in the Stour Estuary. These issues were further considered in an Appropriate Assessment. The Appropriate Assessment identified the need to prepare a Recreational Avoidance and Mitigation Strategy covering the Colne and Blackwater Estuaries Special Protection Areas and Ramsar sites and the Essex Estuaries Special Area of Conservation and a separate Recreational Avoidance and Mitigation Strategy for The Stour Estuary, with a view to their subsequent adoption as Supplementary Planning Documents.

5.5 Work on the Recreational Avoidance and Mitigation Strategies will begin in the summer of 2017. The strategies will identify where recreational disturbance is happening and the main recreational uses causing the disturbance. The strategies, where necessary, will require new residential development, that is likely to affect the integrity of the Colne,

Blackwater and Stour European Sites, to pay for the implementation of the mitigation. The appropriate mechanism will be identified in the strategies.”

Implementation of a RAMS for the Colne and Blackwater estuaries enables the LPA to conclude that Section 2 of the Local Plan will not adversely affect the integrity of the Colne or Blackwater estuaries in terms of recreational disturbance either alone or in-combination.

We believe this work on the RAMS has not been done as no consultation has taken place with Mersea residents or Councils. We believe that the visitor/recreational activities will affect Mersea Island’s surrounding Special Areas of protection and Mersea itself due to sheer numbers of visitors, see paragraph three above. Further more there has been no report/studies on the effect these new communities will have on the Colne and Blackwater Estuaries Special Protection Areas and Ramsar sites and the Essex Estuaries Special Area of Conservation.

It is also not clear how the mitigation can stop/reduce visitors numbers to Mersea and mitigate their activities which will effect these protected areas.

Turning to Para. 3.4 Table 2: Key Sustainability Issues and Problems.

WATER

Under objectives (SO) *“To ensure that there is no deterioration in the water quality as a result of developments”*. Also this comes in para. 3.5.2 Table 4 Sustainability Framework for Assessing the Plan . SA Objective 19

However under Colchester Borough Council Publication Draft Local Plan (Regulation 19) – Section Two Habitat Regulations Assessment Report June 2017 page 25.

Water Quality

Last year the quality of the bathing waters around Mersea Island was assessed and in response the water classification was downgraded in status from Excellent to Good. The Borough Council is working in partnership to improve the status back to Excellent as soon as possible. Clearly any reduction in water quality has the potential to impact on the Blackwater Estuary SPA and the species dependant on it. To help ensure that the bathing water quality will not be made worse by any proposals in the Local Plan Policy PP1 (Generic infrastructure and mitigation requirements) has been added to the Local Plan. This policy includes criteria requiring adequate waste water treatment and sewage infrastructure enhancements for the relevant catchment area; and appropriate SuDS for managing surface water run off within the overall design and layout of the site. Policy SS12c also requires adequate sewage treatment capacity on site to serve any expansion to caravan parks.

We assume that last year refers to the year 2015 as that was the year that the bathing water quality dropped from Excellent *** to just Good ** because it was the same Good ** in 2016. However far from the hoped for return to Excellent the water quality actually dropped further in 2017 to just Sufficient *. This indicates that there has been a serious deterioration in the Mersea bathing water over the last three years.

This deterioration in water quality can only have come about due to human waste being discharged into the River Blackwater. The pollution may well be coming from any of the rivers, streams or other sewerage treatment works that discharge into sea/river areas around Mersea Island. The consequences for Mersea’s fishing/oystering industries and tourism could be devastating and therefore before any further dwellings are built or caravans/chalets added serious consideration must be given as to how to practically mitigate these consequences. No **“hope to improve”** statements will be satisfactory only positive actions will be needed by the Water Authorities. We have been down this route before with Anglian Water Services Ltd in 1990 when West Mersea Town Council lodged a formal complaint to the Commission of the European Communities against failure to comply with Community Law. This case was finally withdrawn when AWS had actual started work on a new sewerage works at West Mersea which had been causing the pollution at that time. This Sewerage works we believe does not have Ultra Violet screening treatment of the discharge water and therefore must be suspect in full treatment of discharge water to the sea and adjacent bathing beaches. The private treatment works for the Caravan sites and Essex Outdoors probably do not have full tertiary treatment either.

Comments from STOP 350 dated 18th January 2018

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