

SECTION COMMENTS FROM MERSEA ISLAND SOCIETY

The Major Headings are in **BLUE** Text

The subheadings are in **GREEN** Text

The full objection of the Society is **RED** Text

Summary of some sections is in **PURPLE** Text

Supporting material is in **BLACK** text.

The Society has submitted as an attachment photographic and other evidence under sections as numbered.

The Society has sent the complete document by email to CCC.

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: Unsound

SUMMARY

The Society is of the view that Mersea Island is not an area meeting these objectives with all the issues outlined in this Submission remain unresolved and concerns due to THE SINGLE access route onto and off the Island. We note below the statement by the Secretary of State for Housing and would suggest this would appear to support our contention that Mersea Island is not a suitable place to build 300 homes, as proposed in Policy PP23.

Secretary of State for Housing, Communities and Local Government Angela Rayner said: Monday 17th August 2026 government's policy statement on the final NPPF consultation.

"By unlocking thousands of homes around well-connected transport hubs, we're helping people lives closer to work, school, and the services they rely on, while backing local businesses and driving growth in our communities.



FLAT PLAN 2026.pdf



ATTACHMENT 4 IN PDF SENT TO CCC Tide Table by local magazine ('Mersea Life'). Black lines indicate expected times when the Strood will be covered.

STROOD FLOODED POINTING TOWARDS ISLAND AT HIGH TIDE – SUMMER 2025
ATTACHMENT 5 IN PDF SENT TO CCC

3.STRATEGIC POLICIES

ST1: Health and Wellbeing

Comment: Unsound

SUMMARY

No data has been provided for the patient doctor ratio or how this excessive number is going to be mitigated without predestining the existing patients. Also access issues to off Island medical facilities due to tidal flooding and lack of reliable public transport.

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 for 2,800 patients, significantly above the national standard of 1 for 1,800, and the local patient list is closed. Previously reported weighted patient numbers were 8,183 (102 East Road, 3 August 2020) and 8,238 (Dawes Lane, 6 March 2020, based on the 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 are 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.

The Mersea Island Society respectfully submits that the Draft Local Plan gives insufficient weight to the fact that Mersea is an island community with unique constraints that distinguish it from other settlements within the Colchester area.

ST2: Environment and the Green Network and Waterways

Comment: Unsound

The Society agrees with WMTC 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. (Regulation 18 submission).

ST3: Spatial Strategy

Comment: Unsound

SUMMARY

Whilst West Mersea is a larger settlement outside Colchester it is in many ways remote with major facilities being some 13 Km away. Also, the main railway 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. Significant employment centres, secondary schools, and further education colleges are in Colchester or beyond.

Large settlements

Whilst West Mersea is a larger settlement outside Colchester it is in many ways remote with major facilities being some 13 Km away. Also, the main railway 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.

NPPF Dec 2025 "S5: Principle of development outside settlements 1. Development for housing and mixed-use development which would be within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services, physically well-related to a railway station or a settlement within which the station is located....."

ST7: Infrastructure Delivery and Impact Mitigation

Comments: Unsound

SUMMARY

The Society does not believe that the Electricity supplier has fully understood the requirements of the Island and their estimated peak demand by 2041 is unrealistic.

Colchester infrastructure Audit and Delivery plan - Electricity

Table 5-1	Primary Substation Pedon 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 dam around the main electric substation supplying Mersea Island and we hope this will work in practice, with the underground cables securely sealed against the ingress of water due to hydrodynamic water pressure.

* WMPP survey of households 2020

ALSO

Also, the December 2025 NPPF *Para. 18 Annexe F table 2: Flood risk vulnerability classification ESSENTIAL INFRASTRUCTURE* requires:

“Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood”

ST7a: Sustainable Transport and Connectivity

Comments: Unsound because

a) Dawes Lane Not a suitable access route for bus

No data exists that we are aware that the road meets operational safety requirements for width, visibility, pedestrian protection, or manoeuvrability, PP23's assumption of bus provision via Dawes Lane is therefore undeliverable, unsound, unless evidence is provided.

b) Strood and infrequent bus service and school buses

It has been reported by a resident that contacting the respective bus companies they have declined to comment in writing to enquiries about their operation regarding the Strood. The Society has observed that the buses will not cross the Strood regardless of height and will terminate at Peldon and Abberton 3 hours before and after high tide.

E1,E2,E3,E4: ENVIRONMENT

Comment: Unsound because no valid assessment undertaken.

The draft Local Plan has not adequately assessed the cumulative environmental impacts of existing and proposed development on Mersea Island. The Society believes that further housing growth risks harming sensitive internationally and nationally protected habitats, particularly oyster beds and

estuarine ecosystems, unless comprehensive environmental assessment and mitigation measures are undertaken first.

The Society supports the Regulation 19 submission by West Mersea Town Council.

On E4, The section highlights the presence of red squirrels on Mersea Island and stresses the need to protect their habitats. The Society supports. It also supports native oyster habitats as irreplaceable environmental assets. It is of concern that additional housing could damage oyster beds and other protected habitats through increased wastewater-related pollution and nutrient loading.

5. GREEN NETWORK AND WATERWAYS

GN1: Open Spaces and Green Network and Waterways

Comment: Unsound because of lack of designation for Mersea

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.

6. LANDSCAPE AND COAST

LC1: Landscape

Comments: Unsound because

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 very much a constraining factor to settlement expansion especially when in-combination their effects are taken into account.

Extract from Inspectors report

Appeal Decision

Inquiry Held between 22 February and 22 March 2022

Site visit made on 1 March 2022

by Nick Palmer BA (Hons) BPI MRTPI

an Inspector appointed by the Secretary of State

Decision date: 13th April 2022

59. In the broader context the site lies within National Character Area 81, Greater Thames Estuary. This is predominantly a remote and tranquil area which includes some of the least settled areas of the English coast. In the development plan, all of Mersea Island other than the built-up areas is designated as part of the Coastal Protection Belt. Policy DP23 of the DP requires that development is not significantly detrimental to the landscape character of the coast and Policy ENV2 of the emerging Section 2 Local Plan has similar requirements. Although the site is not immediately next to the coast it is within the Coastal Protection Belt and the sea is visible from the site. The

60. For these reasons the proposal would not accord with Policy ENV1 of the CS or Policy ENV1 of the Section 2 Local Plan, both of which seek to conserve and enhance the countryside environment and restrict development within the Coastal Protection Belt that would adversely affect its character.

LC3: Coastal Areas

Comments: Unsound because it is missing map of Houseboat area

This picture should be included within the Justification to indicate the area of existing and permitted area houseboats on Coast Road referred to in the Policy LC3.



ATTACHMENT 6 IN PDF SENT TO CCC

LC4: Islands

Comments: Unsound

SUMMARY

The policy acknowledges that the Island has one road on and off the Island which can cut off by high tides. However, the demonstration of safe and suitable access has yet to be shown how this could actually be achieved. Essex County Council / Colchester City Council Emergency Evacuation Plan has yet to be seen.

Whilst there is mention in LC4 b) & c)

b) Proposals must demonstrate that safe and suitable access can be achieved and maintained having regard to the island's tidal access constraints, including the potential for isolation during high tides. Proposals should set out appropriate emergency access arrangements and consider the implications for residents, emergency services, and service delivery.

c) Proposals must demonstrate how they respond to the island's heightened vulnerability to flood risk and climate change, including safe evacuation where appropriate, and residual risk associated with tidal flooding, in accordance with Policy EN8.

However also under Justification in

6.23 it states, "The policy requires proposals to demonstrate how they respond to the specific constraints of an island location, including tidal access, flood risk," and

6.24 Mersea Island has restricted access due to its single tidal road, The Strood. The island includes the parishes of West Mersea and East Mersea."

It is not understandable to the Society how a new development can comply with these requirements/statements when all the Islands existing dwellings must surely have the same requirement.

Also, preamble to PP23 for West Mersea - 12.64 West Mersea ".....the island has one road in and out which at times is cut off by high tides which is a concern in relation to the potential increase in wildfires and the impact of climate change on rising sea levels. This vulnerability is noted on the policies map."

Therefore, the Society believes it should come under the Essex County Council / Colchester City Council Emergency Evacuation Plan.

However, it is the position that **A)** there is not at present a CCC EMERGENCY PLANNING POLICY, and no mention of evacuation plan or indeed a standalone co-ordination centre on Mersea Island with communications to mainland that would help comply with this requirement.

Also, the response from Essex County Council **B)** to FOI is copied below and is more concerning.

A)

Protect – Emergency Response Staff COLCHESTER BOROUGH MULTI-AGENCY FLOOD PLAN (MAFP) Produced by Colchester Borough Council Emergency Planning June 2018 – Emergency Response Staff

Emergency planning at Colchester Borough Council

Major emergencies can happen with little or no warning and have the potential to seriously disrupt the lives of individuals and communities.

A major emergency is something that seriously affects people, buildings or the environment and could include transport accidents, major fire, severe weather such as heavy snow, flooding or high winds and health alerts.

Colchester Borough Council's Emergency Planning team works to ensure that there are emergency plans in place to respond to emergency events. We also work with local communities to help them

create their own plans and ensure residents and businesses have the required information before, during and after an event.

Emergency plans

We work closely with Essex County Council, the emergency services and other agencies and neighbouring districts to regularly assess the threats and risks to the communities within the Borough. This helps us to prepare emergency plans to respond to incidents and to help communities recover after an event.

All agencies which participate in this process are represented on the Essex Resilience Forum (ERF), which acts as a county-wide co-ordinating group.

This involves:

- *identifying any potential risks*
- *assessing the likelihood of an incident occurring*
- *assessing the severity of its effect*
- *looking at what we can do to reduce the chances of the incident occurring.*
- *agreeing who does what in response to an incident.*
- *carrying out any necessary training and exercising*
- *regularly reviewing the plans*

Emergency rest centres

One of our biggest roles in a major incident is to provide emergency accommodation. This could be for people who have been evacuated from their homes or who have been involved in the incident but are uninjured. It could also be for people who cannot access their homes because an incident is in progress.

Rest Centres are normally set up in local schools, village halls, and sports centres. Facilities will range from simple refreshments to makeshift overnight accommodation, as necessary.

For more detailed advice, contact the emergency planning team or call 01206 282222.

Emergency planning at Colchester Borough Council

Original signed on file Adrian Pritchard Chief Executive Colchester Borough Council

Dated August 2016

B)

ECC21068804 09 26 - Emergency Plans for Mersea Island under the Colchester New Local Plan

Received date02/09/2026

Business area Legal

Outcome Information not held

Request summary

Environmental Information Regulations Request

Reference: ECC21068804 09 26

Response: 01 October 2026

I can confirm that Essex County Council does not hold this information.

The Colchester new Local Plan has designated Mersea as an Island with a single access road which requires an emergency plan for evacuation and access, as required by the new NPPF document.

Question 1 - *I would be grateful to know of what plans you have for the Island in way of provision of fire, ambulance, police coverage on the Island.*

Question 2 - *Also, what provision has been made to supply and support the Island community should the seawalls be breached on the mainland beside the B1025 and the road being flooded further inland as this land is lower than closer to the Strood. This happened in the 1953 breaching of the seawalls and the main road B1025 was impassible for many days. Noting that National Lidar mapping indicates the seawalls are now slumped to below the 1953 surge tide height.*

By way of explanation of our response:

Q.1 - Essex County Council collaborates with multi-agency partners through the Essex Resilience Forum, including with Essex County Fire and Rescue Service, East of England Ambulance, and Essex Police. Through this forum Essex County Council has contributed to the development of a Strategic Multi-Agency Flood Plan. This plan is a generic response plan for flooding incidents regardless of location or extent across Essex and therefore does not cover specific arrangements for Mersea Island. We would recommend that you may wish to request information directly from those emergency service organisations you have asked about, as they may maintain specific plans for the Island.

Q.2 - Essex County Council has not made any specific plans to supply and support Mersea Island in the scenario described, as any such location-specific emergency planning is undertaken at the Borough, City, or District level of local government, in collaboration with emergency services and other agencies. We would recommend that you may wish to request this information from Colchester City Council in this regard.

Your Right to Know

*Democracy and Transparency
Essex County Council*

Also, the December 2025 NPPF Para. 18 *Managing flood risk and coastal change*

F7: Ensuring development is safe from flooding.

2. Where development is proposed in a location known to be at risk from any form of flooding, now
or in the future, it should be refused unless:

- b) The development will be safe throughout its lifetime taking account of the vulnerability of its users.
- c) Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Para. 18 Annexe F table 2: Flood risk vulnerability classification Essential Infrastructure requires:

“Essential transport infrastructure (including mass evacuation routes) which has to cross the area of at risk.”

“Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood”.

9.ECONOMY

Policy E1

Comment: Unsound

Cases of pollution in the Blackwater Estuary off the Beach in West Mersea cause concern for tourism directly. This also endangers the main Island industry of Fishing and Oystering. The pollution also contravenes the requirements of the MCZ.

10. COMMUNITY AND SOCIAL INFRASTRUCTURE

CS2: Enhancement of and Provision for Community Facilities

Comments: Unsound

SUMMARY

No data to support any more dwellings on the Island and how new residence can register for Doctors and Dentist. Also, the problems of accessing medical faculties off the Island.

The dependency of the Island community on the voluntary sector to maintain emergency services when the Island is cut off and isolated. With an increasing Ageing community of over 60's now some 44%.

a) No Data for Mersea Medical situation. Yes, the doctors list has been closed since July 2024 but no actual number of patience 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 cannot register with the Island practice as the list is closed. There is knock on effect as residence 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.

b) Voluntary emergency services

The Island has to rely on the several voluntary organisations 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 callouts 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 ten year (census data 2011/2021) from 39.9% to 44.2% for the over 60's, this issue has become more of a problem for recruitment of young active volunteers.



The picture shows West Mersea's RNLI volunteers in action on the Strood roadway rescuing a child and mother from a stranded car.

ATTACHMENT 7 IN THE PDF SENT TO CCC

CS3:

Education Provision

Comments: Unsound

Busing of some 400 plus students to two secondary schools. Also, because of high spring tides the return trip in the afternoon can be a problem with the potential of school children being left stranded at the mainland side of the Strood causeway onto the Island.

The buses to TLA are free the other catchment secondary school in Tiptree has to be paid for by the parents. Or if going to Paxman Academy the changing of buses requires long distant travel at either end of the school day.

CS5:

Tourism, Leisure, Arts, Culture & Arts ; Heritage

Comments: Unsound

Mersea has an international reputation as a supplier of high-quality oysters. They have been sold in London markets and until the UK withdrawal from the EEC, in Paris and other European capitals. The local industry is of major importance and the consumption of oysters attract a large number of visitors. It is said that in the summer months that the Population of Mersea can increase threefold. Harbour is important for yachting with two yacht clubs. There is also a local fishing industry that supplies fresh fish and crabs and lobsters.

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.

Beach area is impacted by erosion and sea walls in places are not being maintained.

11. PLACE AND CONNECTIVITY POLICIES

PC2: Active and Sustainable Travel

Comment: Unsound

SUMMARY

The fundamental transport constraint affecting West Mersea is the Island's dependence upon The Strood, the single road connection to the mainland. Whilst the Local Plan recognises that the Island has one road on and off the Island which can cut off by high tides, traffic congestion, and incidents on The Strood. It identifies this as a particular concern in relation to climate change, emergency access and the potential isolation of residents. This is not simply a conventional highway-capacity issue.

WMTC therefore considers that the transport evidence must address network resilience, not simply normal-day traffic conditions.

TRANSPORT

From ===== Colchester Local Plan Review: Further Transport Evidence 28th 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 however it does not cover the access route onto Island and therefore in Findings do not show the possible total blockage of the access to the Island because of Tides/sea water covering and blocking the highway (see also para. B.2 below).

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 at present goes via Chapman Lane which wider and more suitable route, whilst also picking up all those at the east end of West Mersea, Waldegrave's Caravan site entrance and Blue Row stop. **This suggested route change has no merit, defective in many respects as outlined in our PC2 response. It is not sound.**

4.3.1. Walking access/footway to the village from the PP23 east of Dawes Lane needs to be constructed and upgraded at its 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 pathway.

6.5 Conclusion does not address total blockage of the B1025 at the Strood Causeway onto Mersea Island for periods of few minutes to 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. It also does not address the traffic queues that build up on the mainland approach road.



FLAT PLAN 2026.pdf

ATTACHMENT 3 IN PDF SENT TO CCC

Tide Timetable produced by local magazine 'Mersea Life' . Black lines indicated an estimation when the Stood will be covered. There is also a Strood Cam on a dedicated website that can be viewed as to the ability to get on and off the island.

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 impassible, Queuing traffic can be an issue with some 600* vehicles an hour movement both on and off the Island. The mainland queuing vehicles can be of particular an issue as vehicles keep adding to the queue before it has time to clear the Strood. There is a time gate for access which can be very variable dependant on the tidal height.

* 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 a present traffic survey count is conducted at The Strood B1025 to properly update the traffic numbers. See also B1 above where at Regulation 19 it states “.... site-specific, developer-led transport assessments,” See also NPPF Dec 2025 TR6 & HC 3

This year 2026 the tide during the daytime 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 at the Colchester lay-by bus station does not usually reflect the actual bus cancellation or delays. At the Mersea end there are no announcement boards, and the web site is seldom updated.

Firstbus has yet to advise directly the WMTC of their policy about the Strood crossing due to high tides. 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 movement on and off the Island, there being a time gate for access.

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 Essex County Council supports 4 buses. Konectbus provide a service to Colchester via the B1025 via Peldon about 5 buses a day from 0937 till 1637hrs.

This does not also consider the stoppages due to the unpredicted tides being above 5m+, and therefore Public Transport on and off the Island is 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 4.6m or higher above chart datum. Tides of about 5.9m. which is some 1.3 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 5/6th December 2013¹ 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 (¹ Earth Science Review Southern North Sea storm surge). The bigger/higher tides occur around midday and midnight, which 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 individual casualties from the Island, which does take place on a regular basis. The B1025 is also near/below sea level where 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 throughout the year.

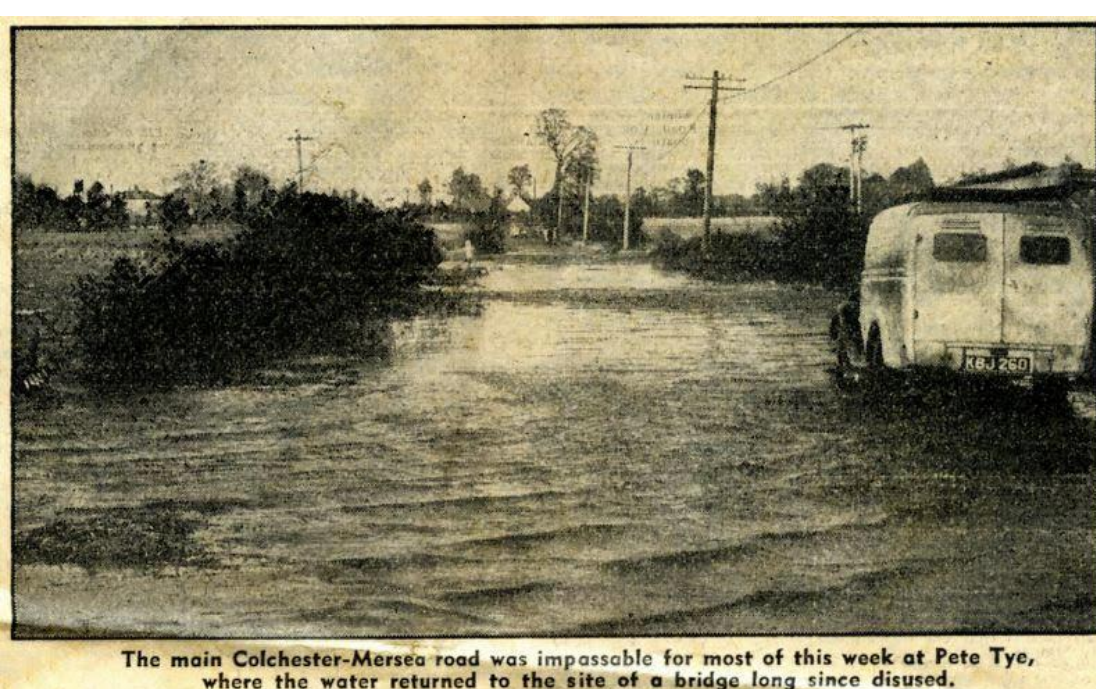
The Causeway onto the Island would need to be raised to 6.5 metres above Chart Datum (4.5m above OD) to ensure the unlikely coverage by the sea. This would require 1.65 Km of road to be raised by some 2 metres, whilst still keeping access to the Island open at most times. The present

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 or 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.

Note that all tidal predictions are based on the Barometric pressure being about 1013 to 1015mbar. Therefore, for every 1mbar drop in pressure increases the height by of the tide height by about 10mm. and vice – versa. However, wind direction can also affect the tidal height, with northerly or Easterly winds causing an increase in level, while southerly winds can cause a decrease in level.

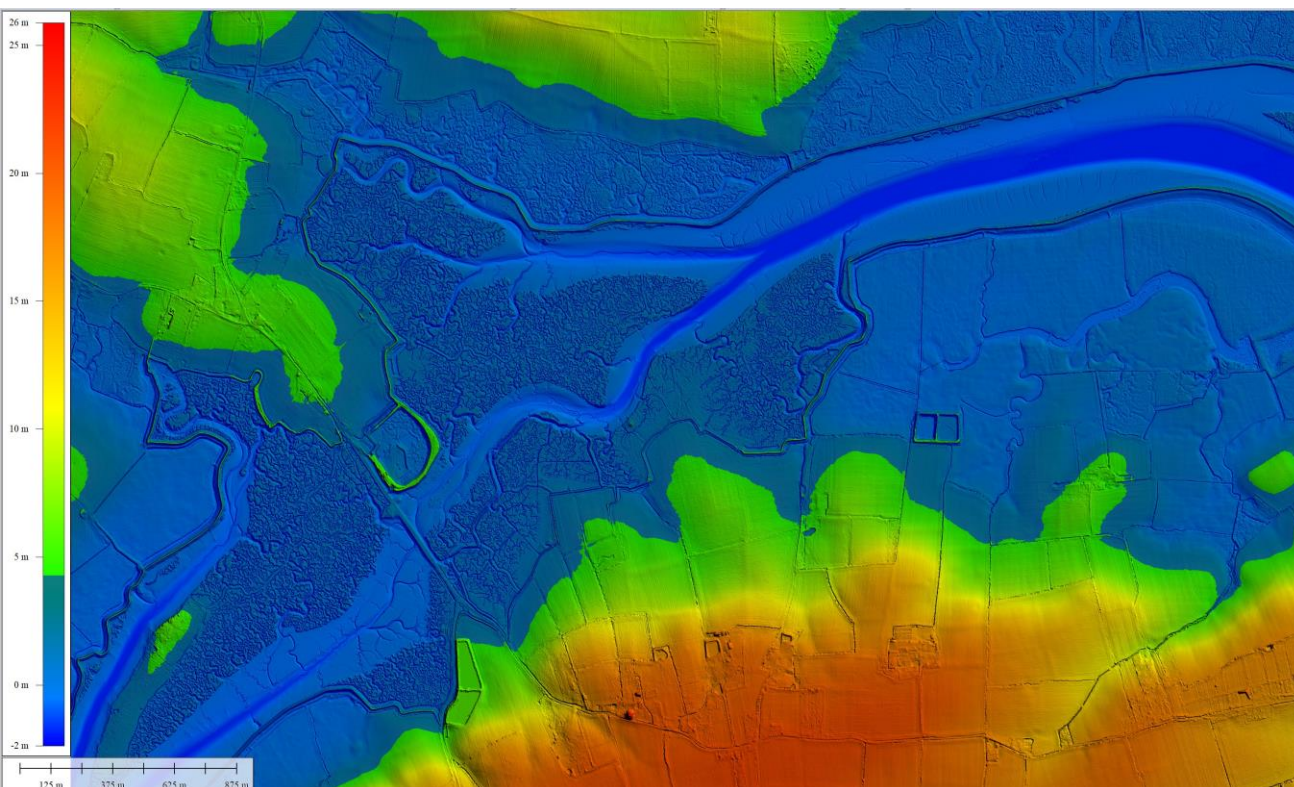


Newspaper cutting Essex County Standard February 1953

ATTACHMENT 8 IN THE PDF SENT TO CCC

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. Through some of this blue area the Strood and B1025 Access Road to the Island passes. Noting the inlet top right of the picture through which the B1025 passes.

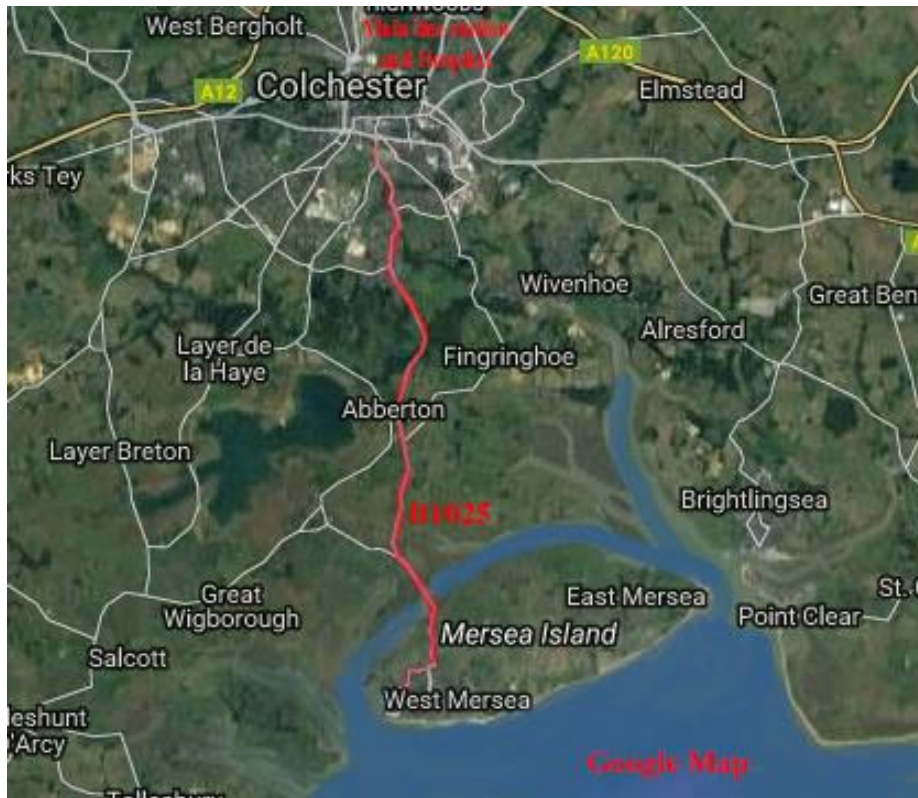
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This Lidar map above shows the equivalent area flooded (coloured Blue) in 1953 when the tidal surge was approximately 4.3 metres above Ordnance Datum or 6.9 m Chart Datum high tide. (*Chart Datum is approx. 2.61m below Ordnance datum (Newlyn). The 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 2mm to 4mm per year, added to which the land is sinking in the Southeast at approximately 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.

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.



ATTACHMENT 10 IN PDF SENT TO CCC

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.

BRADWELL NUCLEAR POWER STATION & SITE

The other issue that respectfully we submit needs consideration is the evacuation of the Island in case there is a significant emergency 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 Secretary of State for Energy Security and Net Zero
Rt.Hon. Ed Miliband statement to Parliament Tuesday 10th June 2025

“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.

NPPF Policy 162 & 172, 178 present planning policies

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 leakage, 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.

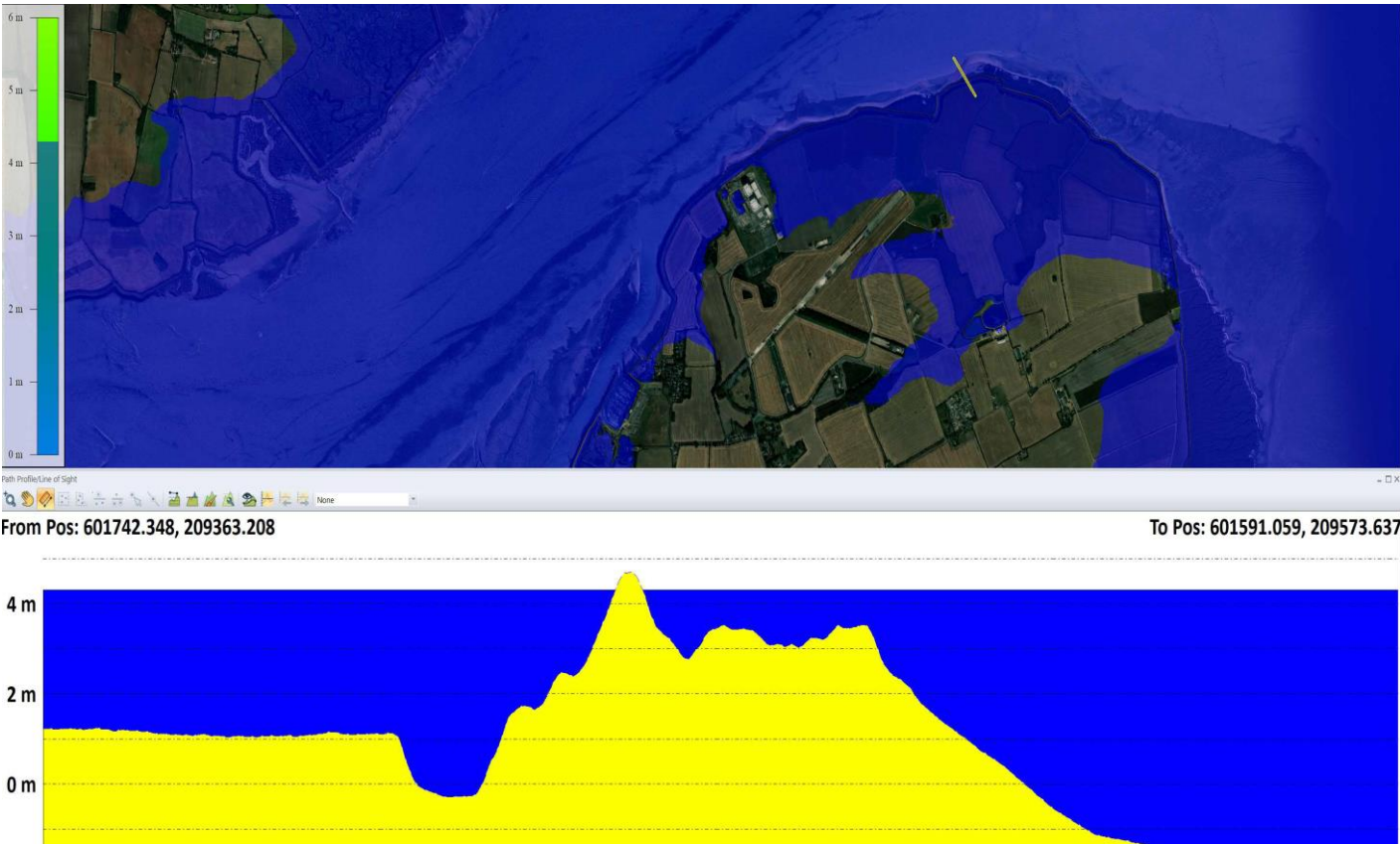
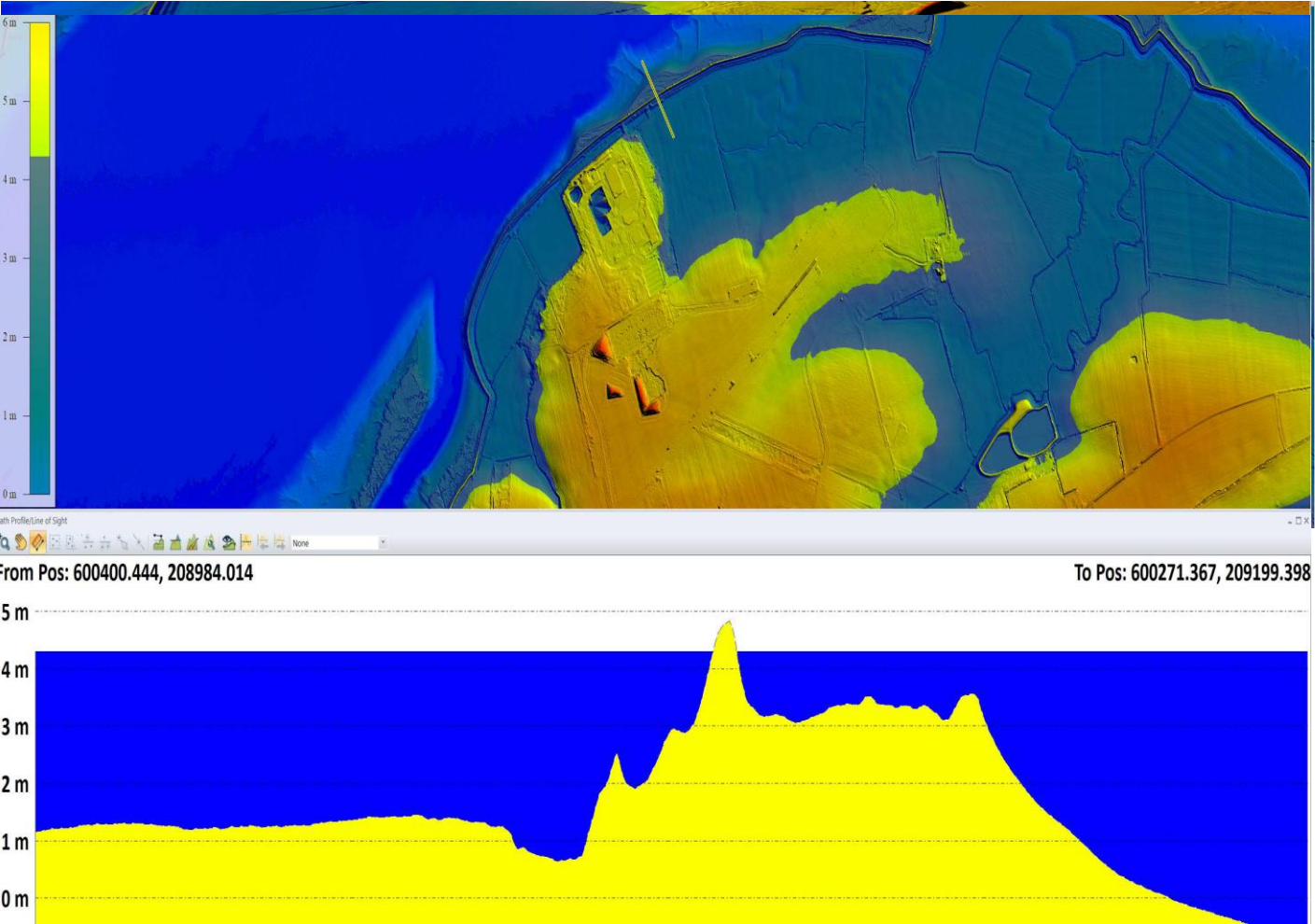
Any further Nuclear Power station at Bradwell will lead to a potential increase in risk of a radiation emergency particularly to the community of Mersea Island which resides directly in the prevailing wind from Bradwell site, some 4Km across the open water.

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.

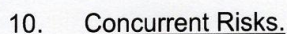
The Office of the Nuclear Regulator (ONR) has stated that the revised Sizewell off-site Emergency Plan will require the priority evacuation of holiday makers. This should be followed in any future planning of evacuation plans. (See also Island Policy LC4.)

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.



Below are details from the Sizewell/Suffolk Emergency Plan:
ATTACHMENT 16 PDF SENT TO CCC

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



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



Above 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.

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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 offsite 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.

12. PLACE POLICIES

PP23: Land East Dawes Lane, West Mersea

Comment: Unsound

"In addition to the infrastructure and mitigation requirements identified in Policy ST7 and site-specific infrastructure requirements from the IADP and subject to compliance with all other relevant policies of this plan, development proposals within the area identified on the policies map will be expected to deliver the following site-specific requirements:

- a. Up to 300 new dwellings of a mix, type, and tenure of housing, including the provision of almshouses, to meet evidenced needs and respond appropriately to the character of surrounding development....”

PP23 fails to satisfy the tests of soundness, particularly in relation to justification, effectiveness, and deliverability, having regard to the Island's distinctive transport, infrastructure, and environmental constraints. Aspects of the are not consistent with national policy and recent strategy policy announced by MHCLG

Secretary of State for Housing, Communities and Local Government statement on 17.08.26.

“Seeking to unlocking thousands of homes around well-connected transport hubs, we’re helping people lives closer to work, school and the services they rely on, while backing local businesses and driving growth in our communities.”

SUMMARY

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. The issues of Island location and tidal access with distance from Train Station, Hospital, lack of public transport, as well as any new residents being able to register with an Island doctor have not been resolved.

Evidence submitted on Soundness, Justification, Deliverability

ST 7 ST7 PC2 & Vision comments; Water supply infrastructure;

E1 E2 E3 and WMTC submission

Drainage and sewerage systems as above

Healthcare services ST1.

Emergency response capability Section 10;

Public transport provision. Section 11; and

CS3 Harm to biodiversity E1 E2 E3

Sensitive habitats E1 E2 E3; E4

Community and Social Infrastructure CS 2 CS3 CS5

Landscape character LC3 and LC4;

Increased flood risk11

Place cumulative impact of seasonal occupation associated with holiday accommodation and caravan sites CS2 CS3 CS5 E1;

Impact on oyster and fishing owing pollution E1

Also, the December 2025 NPPF *Para. 18 Managing flood risk and coastal change*

Para. 18 Annexe F table 2: Flood risk vulnerability classification Essential Infrastructure requires:

“Essential transport infrastructure (including mass evacuation routes) which has to cross the area of at risk”

“Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; and water treatment works that need to remain operational in times of flood”.

Policy PP23a: Mersea Island Caravan Parks

“Provides criteria that will be used to assess the suitability of any new or extensions to existing or intensification of caravan parks on Mersea Island, addressing landscape, environmental and infrastructure constraints. It should be read alongside other policies including policies on coastal areas, landscape, biodiversity, and tourism,”

Comment: Unsound

Reasons:

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

SUSTAINABILITY APPRAISAL

SA Objective 8: Protect, conserve, enhance and restore biodiversity and promote and conserve geodiversity.

SA Objective 10: Minimise greenhouse gas emissions and mitigate and adapt to the effects of climate change.

SA Objective 11: Manage and reduce flood risk from all sources.

SA Objective 14: Protect the quality and quantity of water resources.

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 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 ST 8 a) Protect and enhance the natural environment and secure net gains for biodiversity. ST 8 d) Include measures to support water management, including water efficiency and flood mitigation.

ATTACHMENT 18 PDF SENT TO CCC



ATTACHMENT 19 PDF SENT TO CCC



Blackwater Estuary Natural Flood Management Project

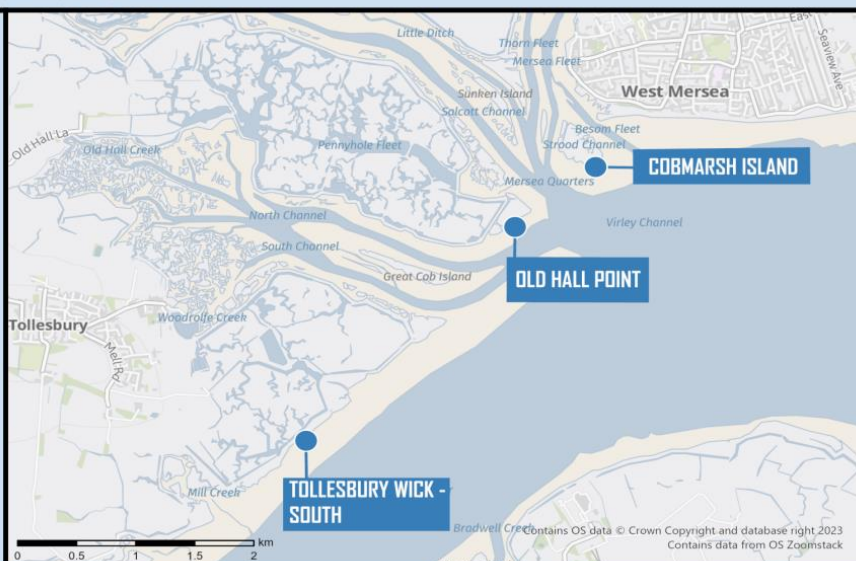


What is the Blackwater Estuary Natural Flood Management Project?

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: blackwaternfm@rspb.org.uk

