



COLCHESTER NEW LOCAL PLAN

SUBMISSION REGULATION 19

“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.”

OCTOBER 2026

Regulation 19 Representation Submitted by Mersea Island Society

Overall Statement on Place Policies PP23 and PP23a: Related comments referenced in other Policies of the Colchester Submission Draft Local Plan Regulation19 Consultation 2026

Introduction

The Society was formed to preserve, safeguard and promote the characteristics of Mersea Island for the benefit of all, to arrange open discussion whenever it appears necessary to obtain a consensus of public opinion and to provide opportunities to gain factual knowledge from lectures, visits and discussion of this great island.

Mersea Island Society Committee wishes to formally express its opposition to the current draft Local Plan for Colchester. This statement outlines the principal concerns and objections that the Committee has identified, highlighting the potential impact on Mersea Island and its residents.

The Society does not oppose sustainable development on Mersea Island where it is proportionate to local need and supported by adequate infrastructure. Nevertheless, Colchester City Council has not yet shown that allocation for PP23 satisfies the tests of soundness, particularly in relation to justification, effectiveness, and deliverability, having regard to the Island's distinctive transport, infrastructure, and environmental constraints.

Reference is made to its Regulation 18 submission. It is hoped that it will be available for the Examination. Concerns relating to public involvement and insufficient steps taken by the City Council to involve residents and others are detailed in the Regulation 18 submission.

Relevant Sections

All sections of the Draft Local Plan relating to:

Housing growth and site allocations affecting Mersea Island.

Infrastructure delivery and capacity.

Transport and connectivity.

Flood risk and climate resilience.

Environmental protection and biodiversity.

Settlement strategy for West Mersea.

Summary of Representation

The Mersea Island Society objects to the Draft Local Plan as far as it relates to Mersea Island.

The Society considers the Plan to be:

Not Justified, because insufficient evidence has been provided to demonstrate that Mersea Island can accommodate the proposed level of development.

Not Effective, because there is no clear demonstration that the infrastructure necessary to support the proposed growth can be delivered.

Not Consistent with National Policy, because the Plan fails to adequately recognise the environmental constraints and flood risks affecting a unique island community.

The Society's principal concern is that insufficient significance has been attached throughout the Plan to Mersea's status as an island settlement which depends upon a single point of access and possesses unique environmental, infrastructure and resilience constraints.

Issue 1: Failure to Properly Recognise Mersea as an Island Community

Objection

The Plan treats Mersea as another settlement within the Colchester urban area rather than recognising its unique circumstances as an island community.

Mersea Island is dependent upon a single access route via the Strood causeway. This route is routinely flooded with consequential disruption and represents a significant constraint upon growth, emergency access, resilience, and sustainability.

The Society considers that the evidence base fails to demonstrate that the implications of this fundamental constraint have been accurately assessed. **2 Vision and Approach to Local Plan**

Why the Plan is Unsound

The Plan is not justified because it does not provide adequate evidence demonstrating that the island's unique circumstances can accommodate the level of proposed growth.

The Plan is not effective because no comprehensive strategy is identified to address the consequences of increasing population and vehicle movements within a geographically constrained island settlement.

Modification Sought

Whilst it is welcome that there is a specific Island Policy (LC4) that is new and recognises that there is a need for a policy applying to islands, in the view of the

Society removal of PP23. Reason is because the submitted Plan proposals on West Mersea do not demonstrate that they will not adversely affect the island's resilience, accessibility, environmental capacity, or community sustainability.

Issue 2: Infrastructure Capacity 10 Community and Social Infrastructure

Objection

The Society is concerned that proposed growth would place unacceptable pressure upon existing infrastructure, including:

The Strood and local road network.

Water supply infrastructure.

Drainage and sewerage systems.

Wastewater treatment facilities.

Healthcare services.

Emergency response capability.

Public transport provision.

The Plan does not provide sufficient evidence that these services have capacity to accommodate the proposed development without prejudicing the existing population.

No data has been presented to support any more dwellings on the Island and how new residence can register for Doctors and Dentist. The list for new patients has been closed since the summer of 2024, the reason given was because of housing development. Evidenced by reference to website for Mersea Island Medical Practice: - "We are currently not accepting new patients. If you live in Mersea and need to register with a GP practice, please contact NHS Essex Integrated Care Board (ICB). The team there will then arrange for you to be allocated to an alternative local GP practice." September 2026.

Also, there are problems of accessing medical facilities off the Island. The hospital is over 12 miles and is impacted by access issues because of the Strood; no through bus service to the hospital and changing at a recognised inadequate and crowded bus station in Colchester. **ST1 Health and Wellbeing**

This is an issue where the person has no access to their own transport and cannot drive. Reference is made to NPPF Para 109 and 110 Promoting Sustainable transport.

Reference also 11 Place and Connectivity

Mersea has a population that where significant numbers are retired and in advanced years. There over 44% over 60; 17.8% between 70-79; 10.4% 80 and over (Census data 2021 West Mersea).

Particular concern exists regarding the adequacy of wastewater treatment infrastructure and the significant gap between identified infrastructure requirements and available funding.

Why the Plan is Unsound

The Plan is not justified because the evidence base does not adequately demonstrate infrastructure capacity.

The Plan is not effective because there is insufficient certainty regarding the timing, funding, and delivery of infrastructure improvements necessary to support growth.

Modification Sought

No further housing allocations should be confirmed until straightforward evidence demonstrates that infrastructure providers can accommodate the proposed level of development and that any required upgrades are fully funded and deliverable.

Issue 3: Excessive Housing Growth PP23

Objection

The Society is of the view that the scale of proposed growth is disproportionate to the capacity of Mersea Island to sustain such development.

More than 200 dwellings have already been delivered or allocated through previous planning policies. The additional proposal for approximately 300 further dwellings would represent a level of growth that risks fundamentally altering the character of the community.

The Society supports modest development to meet identified local needs, particularly affordable housing for local people and younger residents. However, the current scale of growth is considered excessive.

Why the Plan is Unsound

The Plan is not justified because there is insufficient evidence demonstrating why this scale of growth is appropriate for an island settlement with significant environmental and infrastructure constraints.

Modification Sought

Housing targets for Mersea Island should be omitted until the level that reflects local infrastructure limitations, environmental sensitivity, demonstrated local housing need.

Issue 4: Environmental Impact – ST2 Environment and Green Network and Waterways

Objection

Mersea Island contains environmentally sensitive landscapes, designated habitats, and areas of significant biodiversity value.

The Society is concerned that the proposed scale of development could result in:

Harm to biodiversity.

Increased recreational pressure on sensitive habitats.

Loss of landscape character.

Increased flood risk.

Increased coastal erosion pressures.

The Plan does not provide sufficient assurance that these impacts can be avoided or mitigated. The Plan as drafted does not provide evidence that 300 dwellings can be considered without significant pressure being placed on the existing wastewater system and marine environment.

The Society is of the view that the existing local Anglian Water plant is struggling to cope with already existing housing levels. The accumulated impact of the recent housing development in West Mersea is omitted from consideration and in the view of the Society this is a serious inaccuracy.

This is particularly important because Mersea Island is surrounded by a sensitive area of coast namely Blackwater, Crouch, Roach and Colne Estuaries Marine Conservation Zone (MCZ) and the Essex Estuaries Special Area of Conservation.

The Society has studied the submission made by West Mersea Town Council on Regulation 18. The Society's view is there are misgivings whether the evidence and assessment concerns then identified have been dealt with before PP23 was carried forward in the draft Plan as submitted. The Society has concluded based on material it has seen that it has not.

The Society welcomes Policy Proposal LC3 but believes there is limited reference in the view of the Society to the above. It supports the representations made by West Mersea Town Council in its Regulation 19 submission that as stated there is insufficient evidence that the environmental concerns will be safeguarded.

The Society supports West Mersea Town Council's detailed submission on Regulation 19 in this regard.

Why the Plan is Unsound

The Plan is not justified because insufficient evidence has been provided demonstrating that environmental impacts can be satisfactorily mitigated.

The Plan is not consistent with national policy requiring protection and enhancement of the natural environment.

Modification Sought

Further environmental assessment should be undertaken before development allocations affecting Mersea Island are confirmed.

Issue 5: Seasonal Population Pressures PP23 and PP23a

Objection

The Plan fails to properly account for the cumulative impact of seasonal occupation associated with holiday accommodation and caravan sites.

The Mersea Neighbourhood Plan 2024 identifies approximately 1,905 static caravans and lodges on the island. These generate significant additional pressure upon roads, healthcare services, wastewater infrastructure, and public facilities.

The Society believes this seasonal population should be fully considered when assessing infrastructure capacity and future growth requirements.

Why the Plan is Unsound

The Plan is not justified because assessments of infrastructure demand appear to underestimate the actual population served during significant periods of the year.

Modification Sought

Infrastructure capacity assessments should include the cumulative effects of tourism, caravan park occupation, and seasonal population fluctuations.

Issue 6: Consultation and Community Engagement

Objection

The Society does not consider that the specific concerns of Mersea residents have been fully reflected in the draft Plan.

Repeated concerns regarding
Island access.
Flood resilience.
Healthcare provision.
Environmental constraints.
Infrastructure delivery.

These in the Society's view have not been adequately addressed.

Why the Plan is Unsound

The Plan is not supported by sufficient evidence that reasonable alternatives and locally specific constraints have been fully considered.

Modification Sought

Council should be asked to present evidence the Society believes on key evidential matters such as data on usage and delays on the Strood, environmental assessments not in the data presented with the submitted Local Plan.

Bradwell

There is an omission in the Society's view in the submitted Plan concerning the former Bradwell Nuclear Power Station. It is immediately opposite West Mersea in the Blackwater Estuary. It is decommissioned but is used as a storage site for its former spent waste and for receiving material from other nuclear plants. There is not an up-to-date evacuation policy for the island in the case of an emergency. Concern has been expressed about this at the meeting of the Bradwell Local Community Liaison Council held in September 2026 in case of a serious emergency incident. Dangers are present and regulated by the Nuclear Decommissioning Authority. In addition, whilst there are no plans currently to use it as a site for a new Modular Small Reactor (SMR) there is a potential for the Government to so designate it, as sites for SMR's are being considered. The Council has a senior representative to oversee whether this becomes a possibility. NPPF Policy 162 and 172, 178 therefore is of relevance in the view of the Society. The site is not due to be decommissioned until the next century.

Conclusion

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.

The Society therefore requests that the Plan be modified to ensure:

- Recognition of Mersea's unique island status.
- Robust evidence of infrastructure capacity.
- Stronger flood resilience requirements.
- Enhanced environmental protection.
- Withdrawal of the proposed housing growth.
- Greater consideration of seasonal population impacts.

Without such modifications, the Society considers the Plan to be not justified, not effective, and consequently unsound in relation to Mersea Island.

OVERALL

Submission A – **ATTACHMENT 1 IN PDF SENT TO CCC**

