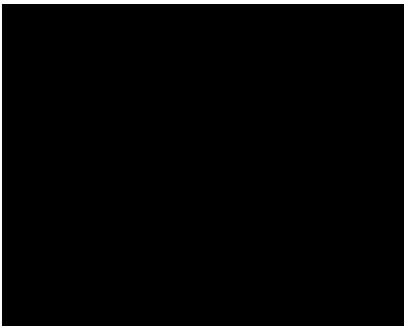




10th January 2026

Planning Policy Team
Colchester City Council
Rowan House
33 Sheepen Road
Colchester
CO3 3WG

Re: Regulation 18 Consultation – Preferred Options Local Plan 2025
Objection to Policy PP23: Housing Allocation East of Dawes Lane, West Mersea

Dear Sir or Madam,

I am writing to formally object to Policy PP23 of the Preferred Options Local Plan 2025, which proposes the allocation of approximately 300 dwellings east of Dawes Lane, West Mersea. This allocation is additional to the 200+ dwellings already identified in the adopted Local Plan 2021–2033. I consider that Policy PP23, as it relates to West Mersea, is unsound and fails to meet the requirements of the National Planning Policy Framework (NPPF) and the statutory tests of soundness.

1. Not Positively Prepared

The Local Plan must be positively prepared to meet development needs in a way that is consistent with sustainable development (NPPF paragraphs 11 and 20). West Mersea is a constrained island settlement with a single access route that is subject to regular tidal flooding. The plan fails to demonstrate how growth on the scale proposed can be delivered safely or sustainably given these limitations.

Emergency access is already compromised at times due to flooding of the Strood, and the island has no police station. No evidence has been presented to show that emergency

service response times can be maintained or improved as required by NPPF paragraph 95. As such, the proposed allocation cannot be considered positively prepared.

2. Not Justified

NPPF paragraph 35 requires that policies be justified by appropriate evidence and represent the most appropriate strategy when considered against reasonable alternatives.

The allocation under Policy PP23 does not adequately consider the cumulative impact of existing and planned development in West Mersea, nor does it sufficiently address reasonable alternatives such as directing growth to more accessible and less environmentally sensitive locations within the borough.

Environmental constraints affecting the Blackwater Estuary, including wastewater treatment capacity and the historic failure to carry out legally required environmental impact assessments, have not been robustly addressed. These issues directly affect protected habitats, shellfish waters, and designated bathing waters. The absence of clear, enforceable mitigation measures indicates that the policy is not supported by proportionate or robust evidence, contrary to NPPF paragraphs 170, 174, and 180.

3. Not Effective

To be effective, a Local Plan must be deliverable over its plan period and based on effective joint working on cross-boundary strategic matters (NPPF paragraph 35).

The proposed level of growth in West Mersea is dependent on significant upgrades to infrastructure that have not been secured or funded. These include:

Wastewater treatment and clean water supply capacity

Medical facilities, where previous commitments to increase provision have not been met and new patient registration lists are currently closed

Public transport services, which remain limited and are themselves vulnerable to flooding at the Strood

There is no clear infrastructure delivery plan demonstrating that these critical constraints will be resolved in advance of, or in parallel with, development. This calls into question whether Policy PP23 can be delivered effectively within the plan period.

4. Not Consistent with National Policy

The NPPF requires development to be located in areas that are accessible, safe, and resilient to climate change (paragraphs 104, 105, and 159). The reliance on a single flood-prone access route conflicts with national policy objectives on transport resilience, climate adaptation, and community safety.

The proposal also conflicts with the NPPF's requirement to minimise environmental harm and avoid development that would place unacceptable pressure on sensitive ecosystems (paragraphs 174 and 180). Without demonstrable improvements to wastewater infrastructure and legally compliant environmental assessments, the policy fails to accord with national policy.

Conclusion

West Mersea Town Council has made clear that the scale of development proposed under Policy PP23 is not sustainable.

For the reasons set out above, Policy PP23 is unsound as it is not positively prepared, not justified, not effective, and not consistent with national planning policy. I respectfully request that the proposed allocation east of Dawes Lane is removed, and that future housing provision for West Mersea is reconsidered only following comprehensive infrastructure, environmental, flood risk, and emergency access assessments.

Yours faithfully,

Karen Ronan