

Chestnuts
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4th April 2015

Parkinson Wright
Unit 4 Abbey Lane Court
Evesham
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Dear Sir

Re Proposed Stour River Mussel Farm

The Stour Estuary extends for some 11 miles East-West straddling the Suffolk/Essex border between Harwich harbour and Manningtree. It comprises mudflats and saltmarshes bounded by low cliffs and sandy beaches and surrounded by farmland or parkland. As noted by Wash Mussels Limited, the estuary possesses several special qualities and features: it is a protected wetland under the RAMSAR convention; there is an SSSI; and it is a Special Area of Conservation (SAC) under the Habitats Directive. In addition, the northern shores are included in the Suffolk Coast and Heaths AONB and the southern shore is presently under consideration for elevation to AONB status.

There have been historic trade associations along the Stour estuary including coal transportation, brick-making and commercial fishing but these have, in the main, ceased. There is limited commercial transport along the river between Harwich and Manningtree but otherwise the estuary has virtually no commercial activity. The Stour is now used by small recreational boats and there is limited wildfowling. As described in the Shotley Peninsula Landscape Character Assessment (Alison Farmer Associates 2013), '...opportunities (for visitors) to experience tranquillity and solace are high.'

The Stour and Orwell Society has concerns that re-introducing commercial activities to the Stour estuary will diminish the features that make it such a special and valuable environment. We confine our observations to landscape and environmental aspects – leaving the matters of recreational boating and fishing to others. We would make the following points:

Visual Impacts

- The lays will be '.... temporarily marked with buoys.' (Sec. 4.4 of ES) Can we be assured that there will be no permanent buoys marking the lays? How will leisure fishing (including non-commercial trawling) be controlled to prevent damage to the lays?
- There will also be a need for marker buoys in order to locate the crab pots – how many? What size and colour?
- If the applicant does carry out spat collection on ropes we believe that this will require permanent buoys. What numbers, size and colours?
- There will be some visual intrusion due to the commercial operation of the boats – again, what is the expected daily/weekly regime?

Effect on wildlife

- The collection and removal of predator crabs will affect the distribution of what is a food source for wading birds, sea bass and other fish species. We are unable to assess fully the potential impact but understand that the RSPB and others may be making more expert comment on the impact on wildlife.
- If the activities are extended to collection from ropes then this will, we believe, involve walking the mudflats with consequent disturbance to bird-feeding and nesting.
- Biosecurity is of prime importance in preserving what is a valuable and sensitive environment in the Stour estuary. Despite the proposed mitigation measures, the ES says (Sec. 5.1) that 'It must be appreciated that it is very difficult to apply meaningful biosecurity measures in estuarine and open marine environments. The greatest risk comes with movements of live shellfish.' Yet this is precisely what the applicant is proposing to do.

Extent of operations

- The proposed Order is for a five-year 'trial period' and the total area of the five lays is 84 hectares. We consider 5 years to be a very lengthy "trial period", in any event.
- If successful, what further extent of operations is envisaged after the trial period?
- The initial lays are all sub-tidal and the applicant implies that there will be little visual impact or disturbance to wildlife on the intertidal mudflats. However, we believe that some buoys will be deployed – see above.
- Some 2,500 tonnes of seed mussels will be planted and some 10,000 tonnes harvested. This is already an operation on an industrial scale.
- The total hours of operations are set out in table 6 of the ES. But how does this translate into daily/weekly boat movements over the five-year trial period. The figures in the table are admitted to be '... averaged guesstimates based on experiences ... in the Netherlands.' This hardly inspires confidence in the applicant's data. More information needed.
- Moreover, there is reference (Sec. 4.4 para 6 of the ES) to the fact that the applicant is '... considering spat collection from ropes deployed in sheltered near-shore locations.' What is the additional area envisaged?

We feel that there is insufficient detailed information to allow the process to proceed further. The applicant should be required to provide much greater detail for further consideration by all interested parties before any authorisation is given for activities which may threaten such a sensitive and highly designated environment.

Yours faithfully

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Cc: Shellfish and Aquaculture Team

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