

Chestnuts
Church Road
Tattingstone
Ipswich IP9 2NA

7th October 2016

Attn. Mr Peter Scott
Harrison Clark Rickerbys
5 Deansway
Worcester
WR1 2JG

Dear Sir

Re Proposed Stour River Mussel Farm – 2nd Consultation

On the 4th of April 2015 I wrote to you, on behalf of the Stour and Orwell Society (SOS), to express some concerns we had over the proposed Stour trial mussel fishery. The Society's principal interests are in preserving the landscape and tranquillity of one of England's prime estuaries. Our concerns included: visual impact; the use of crab pots; the possible extension to the growing of mussels on ropes; noise that might affect birdlife; and biosecurity issues that might arise from importing seed mussels. In the revised application Wash Mussels Ltd. appears to have addressed some of these issues: no growing on ropes; no buoyage; and the procedures for testing and controls on imported seed mussels have been described.

Some reservations remain, however. The use of dredges and the mopping of starfish will inevitably stir up some sediment that might smother other important species, such as fan worms which – as Eastern IFCA have pointed out – form an important part of the food chain in the river.

Then there is the matter of noise that might disturb birdlife. I note that Atkins has carried out sound assessments in their report but only background noise tests were carried out actually on the Stour. Operational noise on board a dredger was assessed on a boat offshore from Margate and the results extrapolated to the Stour. Whilst this may be a routine methodology for these types of measurement, it cannot substitute for actual acoustic testing on the Stour itself.

SOS does not possess the expertise to comment in detail on acoustics, navigation or the impacts on wildlife and we defer to other experts in the RSPB, Suffolk Wildlife Trust, Eastern IFCA and Harwich Haven Authority who will, no doubt, be commenting separately on their particular spheres of interest.

Another concern we have is the potential scale of the operation even during the 5-year trial period. The Stour has been used for leisure sailing and fishing, small-scale commercial fishing and small cargo carriers have had passage to Mistley for many years. By and large these activities have been in scale with the river and its surrounds. What is proposed here is large-scale mussel production by any standards with some 10,000 tonnes of mussels to be harvested over the five years. An average of some 2,000 tonnes per annum stands comparison with Cefas statistics that show total production of mussels in England for 2012 was less than 6,000 tonnes. The trial in the Stour would increase total production for England by a about third. Also, whilst the areas of the lays would total 25 hectares in the first year, by the fifth year, if the trial goes well, this would be increased to a total of 45 hectares. This might double again to the full area where rights are sought. The extension of a monoculture to

such an area, together with proportionate increase in dredging activities and associated disturbances, may well be out of scale with what would be acceptable on the Stour.

One matter that tends to be favoured by local bodies, when considering a proposed enterprise, is the question of the generation of employment. SOS understands that the matter of where the harvested mussels will be landed and processed has yet to be determined. This will be evaluated as the trial proceeds, but we do feel that some analysis of issues as important as these should be undertaken even at this early stage.

If DEFRA decides that the process may proceed then SOS would wish to see that rigorous testing is carried out for the duration of the trial period to prove that the mitigation measures proposed by Wash Mussels Ltd are validated and that the impact on the river and its ecology are acceptable. This should include sound assessment at various points on the Stour during dredging operations: drop down video data collection to assess the condition of the estuarine environment; bird counts; and continuing recording of catches of other species of fish and molluscs. Wash Mussels should share this data with Eastern IFCA and maintain a dialogue with local sailing clubs, Harwich Haven Authority and local wildlife bodies. The results of this testing should be available to local stakeholders on a rolling basis and not held back until the end of the 5 year period.

Natural England has recently been undertaking surveys with a view to extending the Suffolk Coast and Heaths AONB. Their latest proposal would extend it to large parts of the southern bank of the Stour and embrace the whole area of the river itself. In considering the proposal DEFRA should take into account the likely change of designation of the Stour during the trial period and the implications that this might have on the proposed mussel fishery.

Yours faithfully

Rodney Chadburn
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Cc: Shellfish and Aquaculture Team

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