



North Essex Authorities Shared Strategic (Section 1) Plan

Further Hearing Sessions January 2020

Hearing Statement

by

Andrew Martin – Planning Limited

on behalf of

Crest Nicholson Operations Ltd, R.F. West Ltd,
Livelihoods and David G Sherwood

Matter 1 – Habitats Regulations Assessment



NORTH ESSEX AUTHORITIES
Shared Strategic (Section 1) Plan
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INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

MATTER 1

Habitats Regulations Assessment

Question 1 (for the NEAs and Natural England)

Should the HRA have taken account of the implications for European sites of development beyond 2033 proposed in the Section 1 Plan?

1. The Representors (Crest Nicholson, RF West Ltd, Livelands and David G Sherwood) accept that Natural England is the appropriate authority to consider and advise on the Methodology, Screening Assessment, Appropriate Assessment and overall conclusions of the HRA. As stated in the submitted representation HRA is based on the precautionary principle meaning that where uncertainty of doubt remains an adverse impact is assumed (paragraph 1.10 EB/083).
2. However, it appears that the scope of the HRA only relates to that part of the NEA's Section 1 Plan that is proposed to be delivered in the Plan period to 2033. HRA Paragraph 4.15 states that the Shared Strategic Section 1 Local Plan provides for a total housing provision of 43,270 (sic) in the plan period for 2033. In fact the Policy SP3 : Meeting Housing Needs sets out a total minimum housing requirement of 43,720 homes 2023 – 2033 across all three authorities. This includes the submitted total requirement of 7,500 (out of a total of 43,000 homes) to be delivered in the three garden communities. Hence, this leaves a balance of 35,500 homes to be developed beyond the Plan period in the three garden communities.
3. Therefore it is considered that for the HRA to be robust it should assess the total number of units proposed in the Local Plan including those planned beyond the plan period, given that this is the publicly stated intention of the NEAs in Policy SP7.

Questions 2 – 6

No comments.