

North Herts DC Local Plan 2011-2031

References to Appendices to Roy Parker's letter of 11th September 2020

Appendices

1. Accompanies above letter
2. Accompanies above letter
3. Policy SA1 of Central Beds Pre-submission Local Plan 2035 pages 53-56
4. Central Beds Local Plan examination documents EXAM 105
5. Central Beds Local Plan examination documents EXAM 111
6. NHDC examination documents HOU7 Luton HMA Growth Option Study– Figure 2.2
7. NHDC examination documents HOU7 Luton HMA Growth Option Study– Table 1
8. ED 191B –Page 4

Roy Parker

From: Local Plan <LocalPlan@centralbedfordshire.gov.uk>
Sent: 21 August 2020 11:26
To: Roy Parker
Subject: RE: Policy SA5:Houghton Regis North Strategic Allocation

Dear Roy,

Please see below update on Permissions for North Houghton Regis sites 1 and 2 (construction status as at 30/06/2020):

Site	Permission Number	Developer	Permitted Dwellings	Dwellings Under Construction	Dwellings Completed
1	12/03613/OUT	-	4,688	-	-
1	20/00388/RM	Bellway	153	0	0
1	20/00443/RM	Barratt David Wilson	309	0	0
Total			5,150	0	0

Site	Permission Number	Developer	Permitted Dwellings	Dwellings Under Construction	Dwellings Completed
2	15/00297/OUT	-	4	-	-
2	18/00811/RM	Linden Homes	97	15	66
2	18/03530/RM	Bellway	264	74	50
2	19/00883/RM	Countryside Properties	255	7	11
2	19/03232/RM	Countryside Properties	336	0	0
2	19/01218/RM	Taylor Wimpey	625	42	4
2	20/00348/RM	Abbey Homes	160	0	0
2	20/00626/RM	Storey Developments	109	0	0
Total			1,850	138	131

HRN is allocated on green belt. I hope this helps with your enquiry.

Kind regards,
Local Plans Team

Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford, Bedfordshire, SG17 5TQ
 Direct Dial 0300 300 4353 - Internal 74353 – Email Localplan@centralBedfordshire.gov.uk

From: Roy Parker
Sent: 18 August 2020 07:02
To: Local Plan <LocalPlan@centralbedfordshire.gov.uk>
Subject: RE: Policy SA5:Houghton Regis North Strategic Allocation

To: Local Plan team

I would be very grateful for an update on the information you previously gave me on NHR, see below.
 The Inspector's hearings on remaining issues on North Herts DC Local Plan have been rescheduled to restart at the end of September, having been deferred from March.

I am aware from the sign at the entrance to "Bidwell West", photo attached, that there are 6 builders involved in this project but don't know which apply to which numbers in HRN2 shown in your email of 18th February. Are you able to give me that information?

Has any progress been made on HRN1.

Am I right in presuming that the land for this whole site is not in the Green Belt or has not been released from it recently?

Kind Regards

Roy

Roy Parker

From: Local Plan [<mailto:LocalPlan@centralbedfordshire.gov.uk>]
Sent: 18 February 2020 14:05
To: Roy Parker
Subject: RE: Policy SA5:Houghton Regis North Strategic Allocation

Hi Roy,

Not a problem.

As far as the Local Plans Team are aware, given no Reserved Matters have been approved yet, there should be no construction as yet.

Many thanks,
Local Plans Team

From: Roy Parker <[REDACTED]>
Sent: 18 February 2020 13:53
To: Local Plan <LocalPlan@centralbedfordshire.gov.uk>
Subject: RE: Policy SA5:Houghton Regis North Strategic Allocation

Thank you for your speedy reply, very grateful.
Could you please advise me whether there is any construction at the moment on the HRN1 site.
Kind regards
Roy

From: Local Plan [<mailto:LocalPlan@centralbedfordshire.gov.uk>]
Sent: 18 February 2020 12:20
To: Roy Parker
Subject: RE: Policy SA5:Houghton Regis North Strategic Allocation

Dear Roy,

Thank you for your enquiry.

Position for NHR as at end of 2019 as follows:

WELCOME TO
BIDWELL WEST

Linden
HOMES

Buckwood Leys
3 & 4 bedroom homes

01582 788 829
lindenhomes.co.uk

Taylor
Wimpey

Thorn Fields
2, 3 & 4 bedroom homes

01908 272 300
taylorwimpey.co.uk

Bellway

Brambleside
2, 3 & 4 bedroom homes

07813 549 338
bellway.co.uk

Ashberry
Homes

Chalk Fields
2, 3 & 4 bedroom homes

ashberryhomes.co.uk

COUNTRYSIDE
Rural Property Ltd

Milard Grange
3 & 4 bedroom homes

01582 803 664
countrysideproperties.com

Abbey
NewHomes

Oakwell Place
2, 3, 4 & 5 bedroom homes

01582 447 123
abbeynewhomes.co.uk

Central Bedfordshire Council Local Plan 2035

Pre-submission January 2018

7.7 Site Specific Allocation Policies

Policy SA1: North of Luton

Land to the north of Luton as identified on the Proposal Maps, is allocated for a mixed-use development consisting of up to 4000 dwellings and a minimum of 20 hectares of employment land for B1, B2 and B8 uses.

Development in the Strategic Land Allocation will be permitted in accordance with other relevant policies in the Development Plan and the principles set out below. These principles will be defined in more detail through the preparation of a Development Brief which will include a phasing plan. Planning permission will only be granted for development following the Council's adoption of this Development Brief. Design codes will also be required for each phase, to be prepared by the developer and approved by the Council.

In order to ensure the development will be supported by the local and strategic infrastructure needed to ensure sustainable development, in the context of pooling restrictions and multiple landownerships, the Council will refuse any piecemeal planning permission that would undermine the Council's ability to deliver the required infrastructure.

The principles of the development are:

1. The development will form a well designed sustainable urban extension to Luton that will provide a mix of uses necessary to achieve a sustainable and vibrant community, including:
 - a. in the region of 4000 homes with an appropriate balance and mix of residential accommodation to meet identified needs, which shall include subject to viability, a policy compliant mix of affordable housing, starter homes, self/custom build plots and a mix of homes to meet all identified needs for older people;
 - b. a minimum of 20 hectares of employment land, focused primarily to the west of the allocation site and centred around the new M1 Junction 11a to maximise access to the M1 and create an employment hub that compliments the new employment uses at North Houghton Regis;
 - c. provide the serviced land necessary to deliver a health and social care hub within the site to serve the health and social care needs of the proposed development and the needs of the catchment area of that facility and a commensurate financial contribution towards the delivery of that facility;
 - d. provision of new community facilities in accordance with Policy HQ2 including a mix of retail and at least one drinking establishment to serve the existing and new communities everyday needs;
 - e. provision of new educational facilities, comprising day nurseries, early years, primary, secondary and sixth form facilities to meet the identified needs of the development or equivalent facilities to meet the educational and childcare needs arising from the development; and



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Pre-submission January 2018

- f. provision of leisure facilities, including:
 - i. indoor sport and leisure facilities, in accordance with Policy HQ3; and
 - ii. outdoor sport, leisure and open space, in accordance with Policies EE12, including pavilions and allotments.
2. It is critical that development of this site is supported by a comprehensive scheme of highway improvements to mitigate the impacts of the development including an appropriately designed a routed new road to link the A6-M1 Junction 11a, the development shall provide the land and commensurate financial contributions towards its delivery.
3. The development will be phased in accordance with the timing of supporting infrastructure and community facilities including the delivery of the Link road, which shall be delivered as soon as viably possible. The phasing of the road will commence from the west, with the first phase a dual carriageway between M1 Junction 11a and Sundon Park Road to facilitate access to the first phase of development and Sundon RFI employment allocation;
4. The development will provide other supporting transport infrastructure, including proposals to mitigate the impact of traffic associated with the development, including providing for efficient public transport routes through the development that link with key destinations including Leagrave Train Station and Luton town centre;
5. The development shall Integrate and connect to existing public rights of way within and adjoining the site to provide routes to the wider countryside and neighbouring settlements. The development shall include a cycleway connection to route 6 of the national cycleway network and will be required to provide new crossings on the A6 and crossings over the new link road to improve and maintain connections; it is essential that the development contributes towards the delivery of and is served by an appropriately designed and routed new link road between the A6 and M1 Junction 11a;
6. The development shall provide dedicated and safe pedestrian and cycle links from the new and existing neighbourhoods to local centres, employment opportunities, schools, shops and community facilities; both within the allocation and the wider Luton conurbation;
7. The development shall maximise opportunities to create Green Infrastructure corridors through the site linking with existing Green Infrastructure assets, including a link between Bramingham Park and George Wood; and a link between Bramingham Wood and Sundon Wood, beneath the current alignment of the pylon lines. The development shall also provide a green corridor along key routes including the setting of the Theedway and appropriately designed Green Infrastructure to mitigate visual impacts upon the setting of the AONB and the significance of heritage assets;
8. The development shall provide appropriate mitigation, compensation and/or enhancement of key features of biodiversity, to ensure a net gain for biodiversity including but not limited to;
 - a. Sundon Wood CWS, Bramingham Wood CWS, Sunshine Riding Stables CWS, Sundon Quarry SSSI and CWS, Galley and Warden



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Hills SSSI and CWS, Sundon Country Park CWS and Barton Hills National Nature Reserve SSSI; and

- b. Identified protected species and priority habitats;
9. The development shall ensure that the design and construction of the development as a whole including the A6 to M1 junction 11a link road has no undue impact on the AONB, heritage assets and biodiversity and provides for the mitigation and enhancements where feasible. With the exception of the link road any major built development within the AONB shall require exceptional circumstances to be demonstrated and shall only be permitted where it can be demonstrated it is in the public interest;
 10. The development will ensure that any impact on non designated heritage assets with archaeological interest is mitigated in order to record and advance understanding of any heritage assets affected by the development. The mitigation will include making the results of all archaeological investigations publically available for the benefit for this and future generations.
 11. The development will be designed to mitigate any harm caused to the significance of all designated heritage assets within the site boundary and the setting of all designated heritage assets which lie within the site's vicinity. The development will not result in the destruction of any designated heritage assets or their settings and shall deliver mitigation measures that preserve all designated heritage assets and their settings for future generations. This is required in order to ensure that the public benefits of the development outweigh the degree of harm caused to the significance of all designated heritage assets affected by the development.
 12. Subject to the findings of the site specific flood risk assessment the development shall deliver strategic measures to reduce flood risk including the use of sustainable drainage methods (SUDS) to attenuate and discharge surface water run-off at reduced rates, and at least at a rate no greater than if the site were undeveloped and to reduce existing downstream risk. This may include consideration of "off-site" solutions. The development and strategic measures will be designed to ensure there no detrimental impact on groundwater flooding downstream and shall seek to intercept and store surface water flows on site. Regard shall be had to the phased delivery of flood mitigation and SUDS in accordance with the phasing of the development to ensure adequate measures to reduce flood risk (from all sources) are provided throughout the lifetime of the development. The detailed designs of sustainable drainage systems maximise biodiversity enhancement, mitigation of visual landscape impacts, maintenance and safety, when considering their location and relationship to neighbouring uses. Safe access and egress shall be provided taking account of the flood risk at the site.
 13. The development shall be connected to the mains sewerage network and any application for planning permission shall detail any infrastructure upgrades where required and any necessary phasing arrangements;
 14. The development shall provide appropriate landscaping measures to create a sense of place, provide a net gain for biodiversity and shall mitigate the



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potential impact of development on the wider landscape including the AONB. To mitigate harm to the AONB the development shall provide significant landscape enhancements on and beyond the northern allocation boundary and shall create a long term defensible Green Belt boundary as informed by detailed assessments. Noise attenuation fencing to mitigate noise impacts from the new link road will be resisted.

15. Incorporate measures to adapt to climate change, minimise energy use and include renewable energy technologies.

The revised Green Belt boundary follows the extent of the allocation boundary.



**Central
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EXAM 105:

Luton Borough Council versus Central Bedfordshire Council Appendix to EXAM 104

07 May 2020

Central Bedfordshire Local Plan 2015-2035

A great place to live and work.



**In the High Court of Justice
Queen's Bench Division
Planning Court**

CO Ref:
CO/670/2020

In the matter of an application for Judicial Review

The Queen on the application of **LUTON BOROUGH COUNCIL**

versus **CENTRAL BEDFORDSHIRE COUNCIL**

**Application for permission to apply for Judicial Review
NOTIFICATION of the Judge's decision (CPR Part 54.11, 54.12)**

Following consideration of the documents lodged by the Claimant and the Acknowledgement of service filed by the Defendant

Order by the Honourable Mr Justice Jay

Permission is hereby refused.

Reasons:

I have considered the SFG very carefully in the light of the SGR and the key documentation. I agree with the Defendant that full reference must be made to all the material that was available to members in connection with this application, rather than incomplete references to the officers' reports, the emerging eLP and surrounding documentation; as well as to the Claimant's representations in opposition to the planning application.

I agree with the Defendant that, at least conceptually, a proper distinction must be drawn between its plan-making and development management functions.

The Claimant's case stands or falls on Ground A: the remaining grounds are repetitive or, as regards Ground D, incorrect.

Ground A makes a number of points in different ways, but in my view there are three: prematurity; the saliency of the eLP; and whether the Defendant was contending that the Link Road was "essentially required".

As for prematurity and the eLP, the weight to be given to the eLP was for the Defendant to assess, and that was made clear to members – if not in writing, then orally. In addition, I do not think that it is arguable that members were being advised that the fact that the SoS had not called in the application gave rise to the inference that there was no breach of national policy, in particular NPPF para 49. On this issue officers did not overstate the position: see, e.g. para 41 of the SGR. In any event, the key point here is that the eLP was not at a sufficiently advanced stage. It follows that the Defendant was entitled to conclude that the determination of the planning application could proceed in January 2020; and, moreover, to accord relatively little weight to the eLP. Moreover, the determination of the planning application fell to be made on the basis of all the application documents that were before the Committee. This conclusion feeds into VSC issue. It also feeds into the question of how members were entitled to evaluate the planning application on its own merits, rather than being guided by any reservations the inspectors had expressed about the Link Road in connection with the eLP (which reservations I think have been overstated).

As for "essentially required" (or "dependent", which is another way of advancing the

same argument), I agree with the Defendant that the advice given to members in connection with the planning application did not place the bar as high as "essential". In addition, the September '19 report, which is only part of the picture, must be seen as a whole. The fact that the emerging eLP expressed the issue differently does not avail the Claimants.

Had it been necessary to consider s.31 of the SCA 1981, I probably would have granted permission. My preferred approach is to have regard to all the material that was before members in January 2020, and to apply traditional principles to the interpretation of officers' reports.

The costs of preparing the Acknowledgment of Service are to be paid by the claimant to the defendant, in the sum of £9,635.55 unless within 14 days the claimant notifies the court and the defendant, in writing, that it objects to paying costs, or as to the amount to be paid, in either case giving reasons. If it does so, the defendant has a further 14 days to respond to both the court and the claimant, and the claimant the right to reply within a further 7 days, after which the claim for costs is to put before a judge to be determined on the papers. Where the claimant seeks reconsideration, costs are to be dealt with on that occasion.

Signed: Mr Justice Jay

4/5/2020

The date of service of this order is calculated from the date in the section below

For completion by the Planning Court

Sent / Handed to the claimant, defendant and any interested party / the claimant's, defendant's, and any interested party's solicitors on (date): 05/05/2020
Solicitors: SHARPE PRITCHARD LLP
Ref No. WMHR/566.36

Notes for the Claimant

If you request the decision to be reconsidered at a hearing in open court under CPR 54.12, you must complete and serve the enclosed FORM 86B within 7 days of the service of this order. A fee is payable on submission of Form 86B. **For details of the current fee see the Court website** <https://www.gov.uk/court-fees-what-they-are>. Failure to pay the fee or lodge a certified Application for Fee remission may result in the claim being struck out. The form for Application for Remission of a Fee is obtainable from the Justice website <https://www.gov.uk/get-help-with-court-fees>.

**Central
Bedfordshire**

EXAM 111:

Statement of Common Ground between Highways England and Central Bedfordshire Council

15 May 2020

Central Bedfordshire Local Plan 2015-2035

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**Statement of Common Ground (SoCG) between
Central Bedfordshire Council and Highways England
in respect of the Central Bedfordshire Local Plan 2015-2035**

1. Purpose of the Statement of Common Ground (SoCG)

- 1.1. This Statement of Statement of Common Ground (SoCG) between Central Bedfordshire Council (CBC) and Highways England (HE) sets out an agreed position in relation to Junctions 13 and Junction 11a of the M1, along with confirmation on the appropriate usage of the CBLTM strategic transport model for assessing the impact of growth allocations in the Central Bedfordshire Local Plan (CBLP).
- 1.2. It supersedes the previous Statement of Understandings agreed between both parties on those issues it covers.
- 1.3. This SoCG follows extensive engagement and co-operation that has taken place between CBC and HE since the Examination hearing sessions concluded last year.
- 1.4. CBC and HE have held weekly liaison meetings via teleconference since 30th January 2020. These meetings have allowed both parties to keep updated on the progress of work relating to M1 J13 and J11a, as well as other relevant projects within CBC and HE.

2. Background to SoCG

- 2.1. The Inspectors' letter dated 30 September 2019 (EXAM 69) raises concerns around the impact of growth on J13 of the M1, the modelling work undertaken, and the mitigation that is likely to be required, reflecting the discussions at the hearing sessions.

3. The CBLTM Strategic Transport Model

- 3.1. CBC and HE agree that the CBLTM Strategic Transport Model is a modelling tool useful for understand the cumulative impact of the Local Plan growth and as such provides an appropriate basis for assessing the transport impacts of the Plan.

4. M1 Junction 13 Mitigation Study

- 4.1. In the additional Statement of Understanding (EXAM 15) on the issue of M1 J13, signed between HE and CBC in July 2019, it is clearly stated that both parties considered work to identify detailed mitigation schemes in these locations to be ongoing as part of any planning application process, but that sufficient strategic modelling had been

undertaken to inform the Local Plan at an appropriate level of detail to justify and support the Plan's policies and allocations.

- 4.2. Notwithstanding this, CBC have worked closely with HE to progress the HE-led modelling of J13 and to understand the conclusions. Whilst this goes beyond what is generally required for plan-making purposes, this work offers a clear conclusion in terms of ensuring any potential Local Plan impacts can be mitigated alongside the impact of general background growth.
- 4.3. Through this additional work, which consisted of detailed VISSIM modelling of the junctions and the testing of a range of mitigation schemes, HE and CBC have reached a robust conclusion that there is a mitigation solution for J13, which offers the required capacity to accommodate the Local Plan growth (identified as a combination of Scenario 2 and 3). Further details on these options are provided in the Transport Technical Paper.
- 4.4. On this basis, HE and CBC can confirm to the Inspector that, in terms of highways impact on M1 J13, we have agreed the level of growth proposed within the local plan for this area can be accommodated.

5. M1 Junction 11a Mitigation


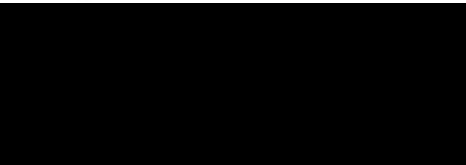
- 5.1. Following the grant of planning permission for the M1- A6 Link Road significant work has been completed on refining a mitigation option for M1 J11a, with CBC working closely with HE to provide a solution for a deliverable mitigation scheme to address the impact of Local Plan allocations in the area.
- 5.2. This work clearly demonstrates that mitigation is possible.
- 5.3. Both HE and CBC as Highways Authorities are satisfied, for plan-making purposes, that the level of growth proposed within the Local Plan can be accommodated by the transport network with the mitigation that is proposed.

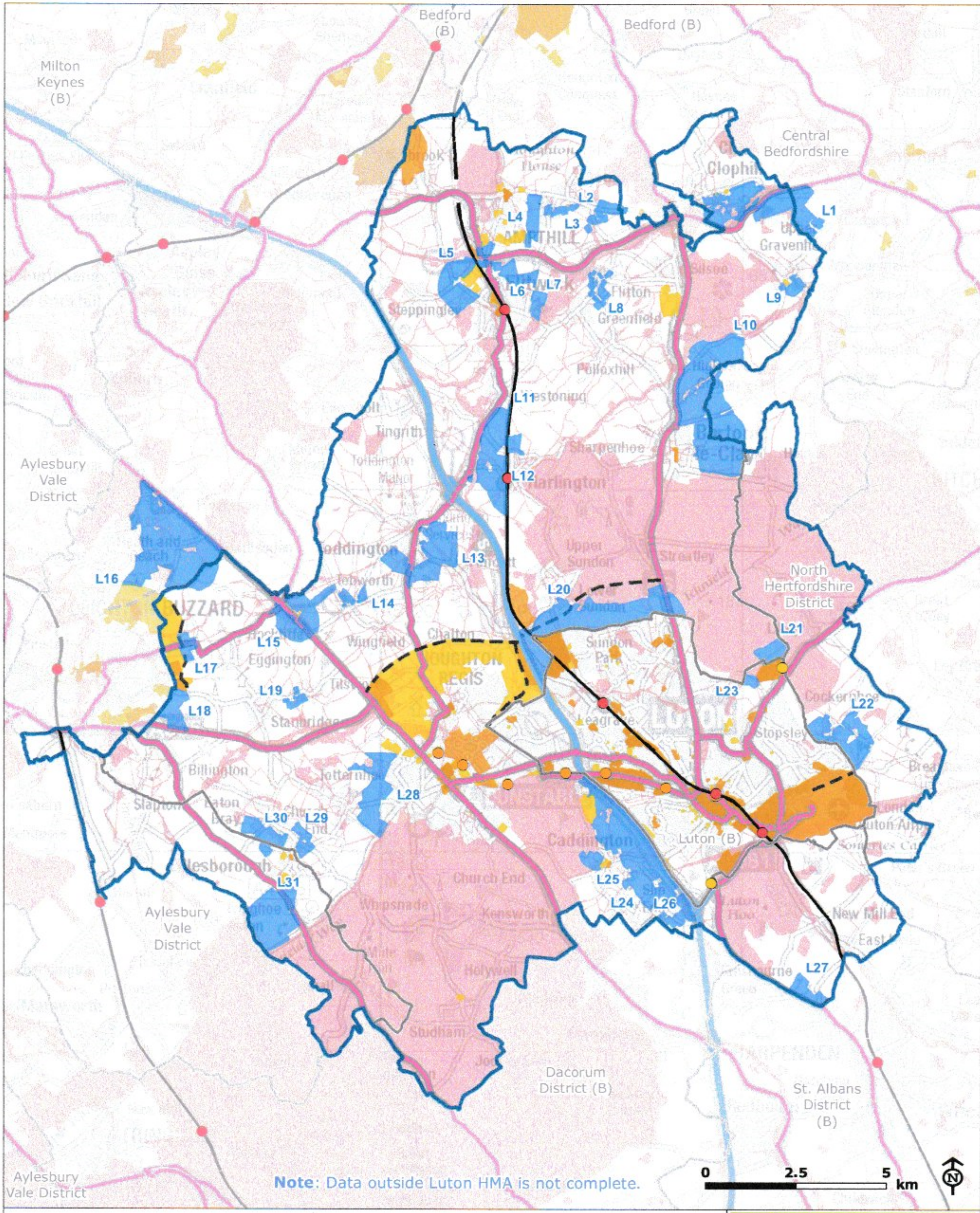
6. Agreement

- 6.1. This SoCG is endorsed by both CBC and HE and demonstrates an ongoing commitment to cooperate in the preparation and delivery of the Central Bedfordshire Local Plan.

6.2. It is agreed by both parties that the content of this SoCG is correct at the date of endorsement.



	Name / Position	Date	Signature
Central Bedfordshire Council	Caroline Danby Head of Strategic Growth	12.05.2020	
Highways England	Eric Cooper Spatial Planning Manager	12.05.2020	



Note: Data outside Luton HMA is not complete.

- | | |
|--|---------------------------------------|
| Luton Housing Market Area | Railway station |
| Local Authority boundary | Guided busway stop |
| Railway | Park & Ride |
| Motorway | Primary constraints |
| A Road | Potential growth location |
| New road scheme of significance to study | Existing or committed employment site |
| | Committed housing site |

LUTON HOUSING MARKET AREA
Growth Options Study

Figure 2.2: Potential Growth Locations



Source: LAs, NE, HE, EA, LUC

Map Scale @ A4: 1:150,000

Table 1: Assessment findings for all locations

ID	Location name	Site area (ha)	Assumed density (dph)	Assumed total net capacity	Estimated net capacity to 2035	Estimated net capacity to 2031 within Luton HMA boundary	Overall deliverability (high / medium / low)	Overall viability (high / medium / low)	No. of secondary constraints present (0-17)	Public transport hub within 1.2 km? (rail stn, guided busway stop, park & ride)	% of location with 'relatively strong' or higher overall contribution to Green Belt
L1	Clophill	199.0	44	5,275	2,000	804	Low	High	9	No	0%
L2	Maulden East	31.5	30	566	566	521	Medium	High	6	No	0%
L3	Maulden South	12.0	30	216	216	216	Medium	High	4	No	29%
L4	Amphill East	37.3	30	671	671	671	Medium	High	5	No	96%
L5	Flitwick West	89.7	44	2,368	2,368	1,500	High	Medium	8	Yes	99%
L6	North of Flitwick	51.3	55	1,693	1,500	900	High	Low	6	Yes	96%
L7	Flitwick East	19.6	55	648	648	648	High	Medium	6	Yes	99%
L8	Flitton	22.8	30	410	410	410	Medium	High	7	No	0%
L9	Gravenhurst	16.8	30	302	302	240	Low	High	4	No	0%
L10	Barton	444.5	44	11,736	2,000	924	Low	High	6	No	66%
L11	North of Harlington	33.0	30	593	593	593	High	High	4	Yes	99%
L12	Harlington West	143.0	55	2,961	2,500	1,500	High	High	7	Yes	98%
L13	Toddington	151.0	44	3,987	2,500	1,500	Low	High	8	No	79%
L14	Tebsworth	14.6	30	263	263	263	Medium	High	4	No	99%
L15	Hockliffe	108.5	44	2,865	2,500	1,500	Low	High	6	No	72%
L16	North of Leighton	405.7	44	10,710	2,500	120	Low	High	9	No	98%
L17	Leighton East	23.8	30	428	428	420	Medium	High	5	No	99%
L18	SE Leighton	50.3	30	905	905	720	Medium	Medium	6	No	99%
L19	Tilsworth	10.9	30	195	195	195	Medium	High	4	No	100%
L20	North Luton	308.5	44	8,150	3,000	2,000	High	High	5	No	90%
L21	Butterfield North	36.5	55	1,205	1,205	900	High	Medium	5	Yes	98%
L22	East Luton	116.5	30	2,100	2,100	2,100	High	Medium	5	No	99%
L23	Butterfield South	10.1	55	330	330	330	High	High	4	Yes	99%
L24	West Luton	299.4	55	9,884	2,500	1,500	High	High	7	Yes	88%
L25	Caddington NW	20.4	30	368	368	368	Medium	High	3	No	13%
L26	M1 J10	33.6	55	1,107	1,107	900	High	High	4	Yes	0%
L27	Harpenden	37.5	30	675	675	669	High	High	3	No	99%
L28	West Dunstable	117.1	44	3,093	2,000	1,200	Medium	Low	6	Yes	99%
L29	Eaton Bray East	22.8	30	411	411	411	Medium	High	5	No	99%
L30	Eaton Bray West	55.6	30	1,000	1,000	720	Medium	High	5	No	85%
L31	Eddlesborough	165.1	44	4,359	2,000	1,200	Low	High	3	No	0%
Total net dwelling capacity				79,474	39,761	25,943					

NORTH HERTFORDSHIRE DISTRICT COUNCIL LOCAL PLAN EXAMINATION

updated OAN figures. This consists of approximately 11,450 homes within the Stevenage Housing Market Area (HMA) and 150 homes within the Luton HMA (see paragraph 18 of the response to the Inspectors' letter).

18. Notwithstanding this change, the Council does not wish to propose any further main modifications or other alterations to the proposed spatial strategy in the submitted Plan other than those suggested in Paragraph 15 above.
19. The Council has consistently sought to provide for its own housing needs as a priority. This principle has been applied across the District as a whole and also within the constituent parts of North Hertfordshire that fall within the Stevenage and Luton HMAs.
20. The revised trajectory suggests approximately 13,250 homes might now be delivered within the Plan period across the District to address North Hertfordshire's own housing needs. This includes 100 homes from the proposed East of Luton allocations to ensure needs arising from that small part of North Hertfordshire within the Luton HMA are met in full.
21. The delivery of 13,250 homes for North Hertfordshire's own needs would represent a buffer of approximately 14% over the revised housing requirement for the District of 11,600 homes. This information is summarised in the table below.

Housing delivery for North Hertfordshire's needs (rounded figures)

	North Hertfordshire	Of which...	
		Within Stevenage HMA	Within Luton HMA
Requirement 2011-2031	11,600	11,450	150
Identified supply 2011-2031	13,250	13,100	150
Surplus / (shortfall)	+1,650	+1,650	0
Buffer	14%	14%	0%

22. The proposed East of Luton allocations have a total capacity of 2,100 homes (Policy SP19). As previously explained to the examination, this accommodates North Hertfordshire's agreed share of the unmet need from Luton and contributes towards the District's own identified housing needs within the Luton HMA. The revised trajectory currently assumes that approximately 1,500 homes might be delivered from the East of Luton sites by 2031. This reflects the delays in the examination process and the time required for delivery to commence on this strategic site once the examination's outcomes are known.
23. As set out above, 100 of the homes to be provided East of Luton are required to meet North Hertfordshire's own needs arising within the Luton HMA. This would leave a balance of 1,400 homes that are presently anticipated to be delivered by 2031 to address Luton's unmet housing needs.