



Boyer



22nd July 2026
Our Ref: 26.5050

By email only
LocalPlan@luton.gov.uk

Dear Sir/Madam,

Re: Luton Local Plan Community Involvement Paper – Scoping Consultation (Regulation 20)

Boyer Planning are instructed by HBD to prepare and submit representations to the Luton Plan – Scoping Consultation (Regulation 20). HBD are the Development Partners of The Crown Estate, Butterfield Land and Luton Borough Council ('the Landowners'), charged with developing Butterfield Business Park ('BBP'). HBD's involvement in BBP began in 2015 and to date have delivered over 30,000sq.m of commercial floorspace at BBP.

These representations should be read alongside the completed Response Form and the accompanying response to the Call for Sites consultation. They follow previous representations submitted in response to the Issues and Options (Regulation 18) public consultation, which ran from December 2024 to February 2025. These representations broadly reflect those previously submitted under the Issues and Options Stage. However, they have been updated to reflect the passage of time and the differences between the Local Plan Community Involvement Paper and Issues and Options document.

HBD welcome the opportunity to be involved in the plan making process and are supportive of the Council's aspirations to support economic growth. However, much has changed since the current Local Plan was adopted in 2017. The new Local Plan must therefore be consistent with the National Planning Policy Framework (2024), informed by up-to-date evidence, reflective of local business needs and wider opportunities for development, and capable of responding to future changes in economic circumstances.

These representations highlight the need for future policies to be sufficiently flexible and adaptable so future employment land requirements and market demands can be met. As evidenced by the changes in market needs and the expectations and requirements of businesses since the adoption of the Luton Local Plan, it is imperative that those policies of the new Local Plan reflect and are able to adapt to evolving demand for high-quality, flexible industrial and logistics spaces. This will help to ensure the Council's aspirations for economic growth are realised and the needs of local businesses are effectively met of the course of the plan period.

HBD



HBD has a proven track record of successfully delivering commercial projects across the UK and has been responsible for the delivery of over 92,000sq.m of commercial development over the last 12 months. HBD therefore has considerable experience across a wide range of property sectors and can demonstrate an extensive track record of delivering small and large-scale schemes and multi phased developments from planning through to construction and occupation. In addition to BBP, HBD's portfolio in the South East includes; Airport Business Park, Southend; Momentum, Rainham, INTER, Welwyn Garden City and Montagu Industrial Estate, Enfield. HBD are therefore uniquely qualified to comment upon issues of supply and demand of industrial and logistics floorspace and highlight opportunities for, and obstacles to, growth.

Butterfield Business Park

BBP has been allocated for employment uses since 1997. Outline planning permission (Ref: 00/00573/OUT) was granted in 2003 for a mixed-use development with the initial phases delivered through Reserved Matters. However, development on the majority of the site stalled due to the financial downturn after 2007/08.

Since taking on the Site in 2015, HBD have secured and delivered planning permissions for E(g)(ii)/(iii), B2 and B8 uses. In an attempt to provide greater certainty to the market in terms of the principle of acceptable uses at BBP, meet the requirements of existing and new business frustrated by the restrictive policy position and secure significant investment and employment opportunities in Luton.

HBD secured Outline Planning Permission (Ref: 23/01319/OUT) for the delivery of the remainder of BBP in 2024. Outline Planning Permission was granted for the remaining circa 13.5 ha of undeveloped land at BBP and secured up to 42,170sq.m (GIA) of new build flexible commercial accommodation. It is anticipated that the delivery of the remainder of BBP will provide a range of unit sizes to accommodate a variety of businesses to ensure employment potential is maximised and capable to responding to future changes in economic circumstances and occupier demand. Most recently, HBD secured the approval of reserved matters for the development of Plot 14, BBP in March 2026 (Ref: 25/01390/REM) which will deliver 6,117sq.m of high-quality employment floorspace.

National Planning Policy

At the heart of the Government's objective of delivering a strong, responsive and competitive economy, is ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation, and improved productivity.

The NPPF sets out that the purpose of the planning system should be to contribute to the achievement of sustainable development (para 8), to which there are three dimensions: economic, social, and environmental.

The NPPF requires planning policies and decisions to:



- promote sustainable patterns of development that seek to meet the development needs of their area (paragraph 11);
- help create the conditions in which businesses can invest, expand and adapt (paragraph 85);
- be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances (paragraph 86);
- pay particular regard to facilitating development to meet the needs of a modern economy, by identifying suitable locations for such uses as gigafactories, data centres, digital infrastructure, freight and logistics (paragraph 86); and
- recognise the specific locational requirements of different sectors including making provision for storage and distribution operations at a variety of scales and in suitable accessible locations (paragraph 87).

Draft National Planning Policy (2025)

On the 16th December 2025, the Government published its Draft NPPF with consultation on the proposed changes concluding on 10th March 2026. The Draft NPPF seeks to revise both plan-making policies and national decision-making policies.

Whilst the Draft NPPF has not yet been adopted and therefore currently carries no weight in decision-making, its consultation has been lengthy and clearly signals the direction of travel the Government wishes to proceed in national policy and particularly the industrial sector. As such, it would be lacking foresight for the Council not to take its provisions into account as part of its Local Plan Review.

Chapter 7 (Building a strong, competitive economy) of the draft NPPF, emphasises the importance of creating the right conditions for businesses to invest, grow and respond to changing market demands in a way that reflects the specific opportunities and characteristics of different areas, supporting long-term economic growth at both a local and national level.

Part 1c (ii) of Policy E1 'Providing the conditions for long term economic growth' supports the provision of storage and distribution uses across a range of scales in accessible locations, recognising their essential role in maintaining efficient supply chains, including last-mile delivery networks. Additionally, Part 1c (iii) of Policy E1 encourages the expansion and modernisation of existing businesses. Part 2 of Policy E1 states that given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses that would be acceptable on sites. This would require Local Plan policies to be sufficiently flexible to accommodate a range of employment uses and to enable developments to adapt and evolve in response to changing economic needs and market conditions. By emphasising the need for flexibility in Local Plan policies, the Draft NPPF supports an approach that allows for the provision of B2 and B8 uses where there is an identified market demand.



Policy E2 'Meeting the need for business land and premises' sets out that substantial weight should be given to the economic benefits of proposals for commercial development in order to support business growth.

The Draft NPPF therefore places significant emphasis on the need for planning policies and decisions to reflect the requirements of businesses, including the need for flexibility to support economic growth and productivity and allow sufficient flexibility to enable businesses to respond to changes in economic circumstances.

Obstacles to Growth

Despite recent challenging macro-economic conditions, e-commerce remains strong, reflected in the continued demand for industrial and logistics accommodation at a national, regional and local level. HBD's own experience confirms that there is significant demand for flexible industrial and logistics accommodation in Luton and particularly at BBP, with strong demand for B8 (Storage and Distribution) accommodation, across all sizes of units.

As evidenced in BPF's recently published 'The Infrastructure of Everything Report' (March 2026) factors driving the growth in demand for flexible industrial and logistics floorspace include; the growth in e-commerce, freight flows, housing growth and increased nearshoring and reshoring. These trends have emerged in recent years, having been accelerated by the COVID-19 pandemic. It is critical therefore that this shift in demand is reflected in the evidence base upon which the emerging Local Plan is prepared and reflected in site allocations and policies.

Whilst Class B8 uses have traditionally been regarded as low value employment, with lower productivity and lower skilled jobs, those businesses operating under Class B8 are increasingly diverse and productive, utilising advanced technologies, leading to higher wages, greater productivity and the need for higher skilled jobs. As highlighted in the BPF report, the shift towards managing machinery and technology has led to job growth in professional occupations such as Supply Chain Managers, Automation Engineers and Health and Safety Managers. As set out in the BPF report, between 2005 and 2025, occupations in Standard Occupational Classification (SOC) groups 1-3 (higher skilled) have increased by 40%, whilst SOC groups 4-6 (mid skilled) have decreased by 30%, and SOC groups 7-9 (lower skilled) have decreased by 19%.

As set out in the UK Warehousing Association (UKWA) Report 'The Size and Make-up of the UK Warehousing Sector' (2024) the role of the warehouse is in increasingly important and the amount of warehouse space needed continues to rise. This can be partly attributed to the fact that warehouses have become central hubs of supply chain activity. The report identifies that since 2021 the warehousing market has grown by 22%, a rise of 124m sq.ft and now stands at just shy of 690m sq.ft.

Evidence from the 'Economic Growth Strategy: Evidence Base Report' (2025), prepared by WSP as part of the Local Plan evidence base, recognises that the logistics sector in Luton is strong and continues to grow. The report identifies that the sector has been growing at an average rate of 2.7% per annum and, based on historic growth trends, could support approximately 10,000 jobs by 2032, representing an increase of around 2,200 jobs.



Furthermore, in determining the outline planning application at BBP the Council's Economic Development Team acknowledged that businesses interested in moving to Luton are mainly looking for large scale, high quality designed general industrial space and high quality, modern space for storage and distribution with excellent transport links in a landscaped setting.

BBP is well placed to support the growth of key employment sectors and be the main strategic contributor leading to an increase in employment for the people of Luton.

Representations

Having regard to the above our response to the questions raised in the Local Plan Community Involvement Paper are set out below.

Developing our Vision and Objectives

5. Do you have any views on what our future strategy should look like, where we should identify new sites for development and what factors and information we should consider?

Before identifying suitable employment sites or considering appropriate planning policies, the Council must ensure they have an up-to-date evidence base. In doing so the Council must undertake a thorough assessment of demand and the land available for economic development over the plan period, having due regard to the approach advocated in the NPPG (Housing and economic land availability assessment).

The Council or their agents should also seek the views of landowners/developers as part of future engagement to ensure the evidence gathering process is reflective of market sentiment and ensure underlying assumptions are robust and make the most efficient use of land.

It is important that any future strategy prioritises the intensification and continued support of existing employment sites, such as BBP, which has a proven track record of delivering employment floorspace that meets the needs of businesses and is therefore well placed to accommodate future employment needs. Existing employment sites, such as BBP, should form the starting point for meeting future development requirements, recognising their established infrastructure, market attractiveness, and ability to deliver growth quickly. To date, BBP has delivered over 30,000sq.m of commercial floorspace, representing a significant contribution to Luton's economic growth. This scale of development and its role as an established employment location should be recognised within the Council's future strategy.

Development Management Policies

16. How should we develop Luton's economy going forward?

By ensuring the Plan is supported by up-to-date evidence, informed by market intelligence and capable of responding to changes in economic circumstances.

Policies should be flexible and not overly prescriptive; there should not be a continued emphasis on prioritising office, light industrial and general industrial uses as this constrains the ability of sites to respond to changing market signals. Policies should be flexible and recognise that there is a growing demand for B8 uses, as outlined above.



18. How should we ensure that new business investment benefits Luton and its residents?

Question 1 in the Options section considers whether there is scope for a Social Value Strategy, with measurable criteria, to be submitted at the planning application stage for all major developments. Whilst the importance of securing social value is recognised, we do not consider that this upfront approach represents the most appropriate mechanism for achieving this objective. Social value can be secured through other more proportionate mechanisms that avoid burdening applicants with upfront requirements. Furthermore, this approach may present practical challenges for speculative developments, where the end user, occupier requirements and detailed arrangements may not yet be known.

19. How can we support economic growth and how and where should land be used to achieve this?

Please see answer to Q16 above.

In terms of where land should be used to support economic growth, as set out above, priority should be given to existing employment sites, such as BBP, which are deliverable in the short term. This will be best achieved through ensuring that policies provide sufficient flexibility to enable these sites to adapt and respond to changing economic needs.

In relation to Question 9 in the Options section, we agree that policies should protect existing employment land. However, care should be taken to avoid introducing a policy approach similar to that within the current Local Plan, which restricts the range of employment uses that can come forward at BBP. As set out above, a significant proportion of economic growth is being driven by B8 uses, and this should be recognised. Policies should therefore provide sufficient flexibility to enable a range of employment uses to come forward in response to changing market demands.

Similarly, in relation to Question 12 in the Options section, there is a risk that this approach creates an overly simplistic distinction between 'higher value' employment and other forms of employment activity, such as B8 uses. While high-technology sectors have an important role to play in economic growth, policies should avoid prioritising these uses to the exclusion of other employment sectors that also make a significant contribution to the economy. Restricting the range of acceptable employment uses could limit the ability of sites to respond to changing market conditions.

As set out in the BPF's 'The Infrastructure of Everything' Report, for every ten new industrial jobs created, approximately ten further jobs are generated throughout the supply chain, while every ten new logistics jobs create approximately nine additional jobs across associated sectors. This compares favourably with the retail and office sectors, where approximately five to six additional supply chain jobs are created for every ten new jobs. This demonstrates that the contribution of B8 uses should not be assessed solely through headline job numbers but should also recognise their wider contribution to economic activity, productivity, and employment generation across the supply chain. This approach is consistent with emerging national policy, which supports flexible and responsive approaches to meeting changing economic needs.



35. How should a new Local Plan approach biodiversity net gain?

Question 1 of the Options section queries if there should be a Local Plan requirement for higher than 10% biodiversity net gain to be achieved on certain developments (e.g. 20%). There is no indication of which sites this higher requirement would apply to; we consider that a consistent approach to BNG should be applied across all development proposals, ensuring clarity for applicants.

57. Do you have any further views about our existing policies, how well they are working and what local development management policies we need?

Adopted Policy LLP7 'Butterfield Green Technology Park' is overly prescriptive and incapable of responding to the needs of a modern economy and is inflexible to accommodate needs anticipated in the plan. Policy LLP7 currently restricts the delivery of Class B8 uses to a specific area of the Site, a restriction which is not justified and would constrain BBP's ability to respond effectively to changing economic conditions, as outlined above.

The requirement to conform with the 'technology park concept' also set out in Policy LLP7 is dated, overly prescriptive and difficult to define, resulting in uncertainty with occupiers seeking to take space and deliver much needed employment opportunity to the Borough. While this was first set out in planning policy terms in the 1997 Borough of Luton Local Plan, was then carried forward to the 2006 Luton Local Plan and then included within the current adopted Local Plan (2017), much has changed during this time, not least the sustained demand for Class B8 uses across Luton. Furthermore, the 2024 Outline Planning Permission allows for flexible Class B8 or Class B2 uses across the whole of BBP.

The new Local Plan must therefore ensure that sufficient flexibility is provided to enable future development at BBP to respond effectively to changing market conditions and the evolving needs of the modern economy.

Conclusion

HBD welcomes the opportunity to participate in the plan making process and is supportive of the Council's ambition to drive economic growth.

Significant changes in economic conditions, particularly within the industrial and logistics sectors, have occurred since the adoption of the Local Plan (2017). These representations highlight the need for a more robust and responsive approach. Greater flexibility is required to ensure employment policies can respond effectively to market signals and support the delivery of modern employment space, particularly in the industrial and logistics sectors. Without this, the Council's economic growth ambitions may not be realised.

HBD therefore recommends that the Plan:



- Provides flexibility across employment uses, including B2 and B8;
- Is informed by up-to-date evidence and market signals;
- Supports the intensification of existing employment areas; and
- Aligns closely with the NPPF and the soon to be adopted Draft NPPF

HBD look forward to continuing to engage with the Local Plan process and hope that the emerging Local Plan continues to support the delivery of high-quality flexible employment space at BBP, enabling the park to respond to evolving business needs and contribute to the area's long-term economic growth.

Yours sincerely,

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