

23<sup>rd</sup> July 2026  
RGPL371336V2/A3/JB/JD



Luton Borough Council  
Town Hall  
George Street  
Luton  
LU1 2BQ

Jonathan Dixon

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By email only to: [localplan@luton.gov.uk](mailto:localplan@luton.gov.uk)

Dear Sir / Madam,

**LUTON LOCAL PLAN REVIEW – SCOPING CONSULTATION – REGULATION 20 REPRESENTATIONS ON BEHALF OF THE CROWN ESTATE**

Savills (UK) Ltd have been instructed by The Crown Estate (TCE) to submit representations to the Luton Local Plan Scoping Consultation.

As part of the new 30-month plan-making process, Luton Borough Council (LBC) are conducting early engagement in the form of a scoping consultation to gather views on what the new Local Plan should look like, including local priorities and focus areas. This scoping consultation stage runs until 23<sup>rd</sup> July 2026.

According to the LBC consultation webpage, comments can be submitted either via the consultation platform, by post, or by email to [localplan@luton.gov.uk](mailto:localplan@luton.gov.uk). This response is submitted by email only.

Our response to the scoping consultation seeks to assist in informing the future preparation of a new Luton Local Plan by responding to the questions contained within the consultation document.

It is understood that there is the opportunity to respond to several live consultations, as set out below. Those in green text are what we are responding to:

- [Community Involvement Paper – Scoping Consultation \(May 2026\)](#)
- [Strategic Environmental Assessment Scoping Report \(May 2026\)](#)
- [Engagement Strategy Scoping – Consultation May 2026](#)
- [Local Green Space Nomination Form May 2026](#)
- [Call for Sites \(May 2026\)](#)

In relation to the above live consultations, there are also several response forms, which appear to overlap somewhat. Those in green text are the forms we are utilising within this response:

- [Community involvement paper scoping response form](#)
- [Community involvement summary booklet response form](#)
- [Strategic environmental assessment scoping report response form](#)
- [Call for sites proforma](#)
- [Local green space nomination response form](#)

Each question that we are responding to is set out in full below (Appendix 1), alongside the relevant response on behalf of our client in blue. It is noted that some of our responses are duplicated across the various forms given the repetition in the questions posed.

Our client should like to contribute towards future stages of the Local Plan preparation process and should therefore be grateful if LBC would ensure that we are added to any list of those advised of further opportunities for participation and the submission of representations.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

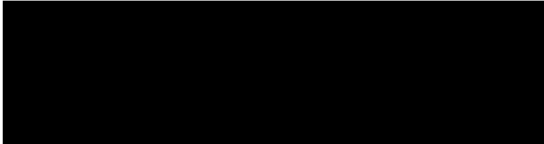
Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.  
A subsidiary of Savills plc. Registered in England No. [REDACTED]





Please do not hesitate to contact me if you have any questions regarding these representations or require any further information.

Yours faithfully,



**Jonathan Dixon**  
Director

Enc: Appendix 1: Representations to Luton Borough Council Scoping Consultation

## APPENDIX 1

### REPRESENTATIONS TO LUTON LOCAL PLAN SCOPING CONSULTATION

#### Community Involvement Paper (Scoping Consultation) May 2026

##### Developing our Vision and Objectives

#### 2. What do you think of our draft Vision?

*Having a strong Vision that underpins the Local Plan and its policies is vital in ensuring sustainable, well-connected, and sensitive development that serves local communities. The Crown Estate are generally supportive of the key priorities proposed within the Vision set out across the various consultation documents, although recognise that Local Plan policies should be prepared and applied on a proportionate and site-specific basis to reflect contextual circumstances.*

#### 3. What do you think of our draft Objectives?

*It is acknowledged that the 26 draft Objectives seek to deliver the Vision for Luton, and address a wide range of important planning issues including housing delivery, employment opportunities, regeneration, coordinating infrastructure provision and accessibility, high-quality design, climate change, and environmental enhancement.*

*Whilst The Crown Estate recognise the importance of these matters, the 26 draft Objectives are not considered sufficiently focused. Paragraph 8 of the NPPF (December 2024; as amended February 2025) identifies three overarching objectives to achieving sustainable development: economic, social, and environmental. Strategic Objectives should provide a clear and concise framework to guide the Local Plan, in line with Paragraph 8 of the NPPF. Further, there should be a clear link between the Vision, the Strategic Objectives, and the policies throughout the Local Plan.*

*It is therefore recommended that the Objectives are reviewed and revised into a smaller number of distinct, outcome-focused objectives centred around achieving sustainable development. Developing a more concise set of Objectives would provide greater clarity and focus, and would ultimately create a stronger framework through which to prepare, implement, and monitor the Local Plan.*

##### Our Strategy

#### 4. What period do you think our Local Plan should cover?

*As per Paragraph 22 of the NPPF (December 2024; as amended February 2025), there is a requirement for Local Plans and strategic policies to look ahead over a minimum period of 15 years from the point of adoption. If adopted in 2028 (according to the Local Plan Timetable<sup>1</sup>), the Local Plan should therefore plan for development needs and policies through to 2043. It is important to emphasise the requirement in national policy to plan for a 15-year period from the point of adoption, and not simply from the date the Plan is prepared.*

#### 5. Do you have any views on what our future strategy should look like, where we should identify new

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<sup>1</sup> [https://www.luton.gov.uk/sites/default/files/2026-05/Local%20plan%20timetable\\_0.pdf](https://www.luton.gov.uk/sites/default/files/2026-05/Local%20plan%20timetable_0.pdf)

sites for development and what factors and information we should consider?

*Whilst our client is generally supportive of the skeleton proposals set out across the various consultation documents, we reserve the right to comment on the more detailed strategy once it has published. Our client supports the Council's intention to be proactive in gathering wide ranging views from across the District, from local communities, residents, key stakeholders, and businesses. As per Paragraph 16 (c) of the NPPF (December 2024; as amended February 2025), the Local Plan must: "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees". Ultimately, the future strategy should be guided by identified local need, seeking to promote sustainable patterns of growth (Paragraph 11 (a) NPPF, December 2024; as amended February 2025).*

#### **Providing suitable and sustainable homes**

**6. How should we establish the number of homes we need to plan for and where should new homes be located?**

*As set out in 'Chapter 5 – Issues and Options for Luton' of the 'Community Involvement Paper – Scoping Consultation', the Council rightfully recognises the importance of providing suitable and sustainable homes. This approach, including the provision of sufficient affordable housing, is supported by The Crown Estate and should remain a core priority throughout the review of the adopted Local Plan and preparation of a new Local Plan.*

*In accordance with Paragraph 62 of the NPPF (December 2024; as amended February 2025), strategic policies in the Local Plan should be informed by a local housing need assessment, conducted using the standard method, and should also consider any further needs that cannot be met within neighbouring areas. It is noted that Luton's current housing need is 1,095 homes per annum, based on the standard method. However, delivering such housing growth, plus an appropriate buffer, presents a significant challenge, particularly given that "the town is built up to its boundaries and there are limited sites available" (Paragraph 5.2). The constrained nature of Luton's boundaries and the encompassing nature of North Hertfordshire and Central Bedfordshire should therefore form a key consideration within the Luton plan-making process.*

*In this regard, the Strategic Housing Allocation 'Sites EL1, EL2, and EL3 East of Luton' within the adopted North Hertfordshire Local Plan (2022) will deliver 2,100 homes and will significantly contribute to meeting unmet local housing need from Luton, and specifically the types and sizes of family homes that it is hardest to meeting within Luton itself. This allocation should therefore be viewed as a clear opportunity to continue to meet the area's overall housing requirements, consistent with Paragraph 24 of the NPPF (December 2024; as amended February 2025) which highlights the importance of effective strategic planning across Local Planning Authority boundaries to ensure sustainable growth, including in meeting the housing needs of a wider area.*

*In line with the proposed Vision and Strategic Objectives, the Council should continue to maximise opportunities for sustainable redevelopment within urban areas, however, where evidence clearly suggests that not all housing needs can be sufficiently addressed within the Borough's boundaries, including affordable housing, the Local Plan should continue to look beyond the boundaries into neighbouring Authorities to explore further opportunities for sustainable growth.*

## Community Involvement Paper – Summary Booklet (May 2026)

### Developing our Vision and Objectives

#### 1. What do you think of our draft Vision?

*Having a strong Vision that underpins the Local Plan and its policies is vital in ensuring sustainable, well-connected, and sensitive development that serves local communities. The Crown Estate are generally supportive of the key priorities proposed within the Vision set out across the various consultation documents, although recognise that Local Plan policies should be prepared and applied on a proportionate and site-specific basis to reflect contextual circumstances.*

#### 2. What do you think of our draft Objectives?

*It is acknowledged that the 26 draft Objectives seek to deliver the Vision for Luton, and address a wide range of important planning issues including housing delivery, employment opportunities, regeneration, coordinating infrastructure provision and accessibility, high-quality design, climate change, and environmental enhancement.*

*Whilst The Crown Estate recognise the importance of these matters, the 26 draft Objectives are not considered sufficiently focused. Paragraph 8 of the NPPF (December 2024; as amended February 2025) identifies three overarching objectives to achieving sustainable development: economic, social, and environmental. Strategic Objectives should provide a clear and concise framework to guide the Local Plan, in line with Paragraph 8 of the NPPF. Further, there should be a clear link between the Vision, the Strategic Objectives, and the policies throughout the Local Plan.*

*It is therefore recommended that the Objectives are reviewed and revised into a smaller number of distinct, outcome-focused objectives centred around achieving sustainable development. Developing a more concise set of Objectives would provide greater clarity and focus, and would ultimately create a stronger framework through which to prepare, implement, and monitor the Local Plan.*

#### 3. 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?

*Whilst our client is generally supportive of the skeleton proposals set out across the various consultation documents, we reserve the right to comment on the more detailed strategy once it has published. Our client supports the Council's intention to be proactive in gathering wide ranging views from across the District, from local communities, residents, key stakeholders, and businesses. As per Paragraph 16 (c) of the NPPF (December 2024; as amended February 2025), the Local Plan must: "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees". Ultimately, the future strategy should be guided by identified local need, seeking to promote sustainable patterns of growth (Paragraph 11 (a) NPPF, December 2024; as amended February 2025).*

#### 4. What time period do you think our Local Plan should cover?

*As per Paragraph 22 of the NPPF (December 2024; as amended February 2025), there is a requirement for Local Plans and strategic policies to look ahead over a minimum period of 15 years from the point of adoption. If adopted in 2028 (according to the Local Plan Timetable<sup>2</sup>), the Local Plan should therefore plan for development needs and policies through to 2043. It is important to emphasise the requirement in national policy to plan for a 15-year period from the point of adoption, and not simply from the date the Plan is prepared.*

### **Providing suitable and sustainable homes**

#### **6. Are there any housing issues that you want to tell us about?**

*As set out in ‘Chapter 5 – Issues and Options for Luton’ of the ‘Community Involvement Paper – Scoping Consultation’, the Council rightfully recognises the importance of providing suitable and sustainable homes. This approach, including the provision of sufficient affordable housing, is supported by The Crown Estate and should remain a core priority throughout the review of the adopted Local Plan and preparation of a new Local Plan.*

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