24 NOV 2010

MARTIN
ROBESON
PLANNING
PRACTICE

Town Planning Consultants
Development Advocacy

10/04238

PLANNING AND RETAIL ASSESSMENT

PROPOSED EXTENSION TO EXISTING TESCO STORE, VIMY ROAD, LEIGHTON BUZZARD

NOVEMBER 2010

CONTENTS PAGE

APPENDICES

1. INTRODUCTION

1.1 This Planning and Retail Assessment is submitted in support of Tesco's proposals to extend its existing foodstore at Vimy Road, Leighton Buzzard. The existing store occupies land between the Grand Union Canal and Vimy Road. The existing store footprint is 5,949m² GEA accommodating 3,105m² net retail sales floorspace. Of this, 466m² is occupied by comparison goods. Adjacent to Tesco is a Homebase accommodating 4,723m² net sales floorspace along with a 957m² garden centre. The car park serving both retail stores contains 501 car parking spaces of which 20 are for designated spaces for disabled users and 19 parent and child spaces. The proposal site takes in the existing Tesco store, Homebase and the car park.

1.2 The store is accessed from Vimy Road which in turn forms a junction with Leighton Road. This has recently changed from a signal controlled T-junction to a roundabout. These proposals do not alter this arrangement.

1.3 It is evident from observation that the Tesco store is very busy. It is often overcrowded, there can be long queues at the checkouts and there is often a need for the shelves to be restocked during busy times.

1.4 These observations are borne out by the conclusions of the White Young Green Luton and South Bedfordshire Retail Study Update January 2009 which concluded that the Tesco store *"continues to exhibit significant overtrading"*[1].

1.5 The proposed extension is a response to the trading conditions within the store. The purpose is two-fold; to improve the existing shopping environment, improve the depth of stock and improve the range and choice available to customers. The proposal is for a 2,650m² gross external area extension to the existing foodstore. In addition, a further 34 car parking spaces will be created of which 8 will be disabled spaces and 4 will be parent and child spaces making a total of 534 car parking spaces at a ratio of 1:16.9.

[1] Luton and South Beds Retail Study Update, January 2009, paragraph 6.25.

1.6 The extension will accommodate 1,525m² net retail sales floorspace as defined within Annex 1 to the Competition Commission's 2008 report, *"The sales area within a building (ie. all internal areas accessible to the customer) but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts"*. Of this 511m² will be for convenience goods and 1,014m² will be for comparison goods[2]. Whilst the existing Homebase contains predominantly DIY and other bulky goods it does sell a range of small electrical appliances, kitchenware and homeware goods that are also sold by Tesco. It is estimated that these types of goods would occupy approximately 400 m² of the proposed sales floorspace. In effect, extending the Tesco will result in a net increase of only 614m² new comparison goods sales floorspace in this location.

[2] The extent of the net retail sales floorspace can be controlled by condition restricting the total of the store as extended to 4,630 m² of which no more than 1,480 m² is to be occupied by comparison goods.

2. POLICY CONTEXT

2.1 The existing development plan comprises the Saved Policies from the South Bedfordshire District Local Plan Review (January 2004) and those of the Luton and Bedfordshire Structure Plan (1997).

2.2 The Core Strategy Preferred Options consultation document was published in April 2009. It is expected that the Draft Submission draft will be published in November 2010.

2.3 An important material consideration with respect to determining planning applications for main town centre uses is PPS4.

2.4 The South Bedfordshire District Local Plan identifies Leighton Buzzard as a Town Centre. The emerging Core Strategy describes it as a Major District Centre. Along with Dunstable the two towns form the second tier of the retail hierarchy below the sub regional centre of Luton.

2.5 Bearing in mind the Local Plan was adopted in 2004 and that Policy TCS6 has not been saved, PPS4 is the most up to date guidance applicable to the assessment of this planning application.

2.6 Design matters are addressed within the accompanying Design and Access Statement which has had regard to the document Design in Central Bedfordshire – A Guide for Development and the Design Supplement 2 – Larger Footprint Buildings.

2.7 Policy EC10 of PPS4 encourages local planning authorities to *"adopt a positive and constructive approach towards planning applications for economic development"* (Policy EC10.1). EC10.2 sets out five impact considerations that all planning applications for economic development should be assessed against. Consideration of the proposal in the context of these five considerations will form the first element of this assessment.

2.8 Policy EC14 sets out the evidence to be considered in support of an application for a main town centre use. EC14.3 requires a sequential assessment under EC15. EC14.4 requires an impact assessment as set out in EC16.1.

2.9 In considering whether there are sites in or on the edge of existing centres the applicant must demonstrate that flexibility has been applied in terms of the matters raised in EC15.1(d). Local Authorities must take into account any genuine difficulties which an applicant may have in operating its business model from a sequentially preferable site (EC15.2).

2.10 EC16 sets out the matters to be considered within an impact assessment. Six impact considerations are identified. Of relevance to the assessment of this planning application are the considerations raised at a), b), d) and e). c) requires consideration to be given to the impact that a proposal may have on allocated sites outside town centres. There are no allocated sites outside of the town centre. f) refers to locally important impacts under Policy EC3.1.e. None are identified within the adopted Local Plan or the emerging Core Strategy.

2.11 On the basis that the sequential test is satisfied and that the proposal will not lead to significant adverse impact under EC10.2 and EC16.1, Policy 17.2 requires that the proposal be determined taking account of positive and negative impacts that may result and the cumulative effect of recent permissions, completed developments and those under construction.

2.12 This assessment now turns to retail advice provided to the Council.

3. RETAILING IN LEIGHTON BUZZARD

3.1 There are three main foodstores serving the urban population of Leighton Buzzard and those villages surrounding the town. A Waitrose foodstore containing 1,200m² retail sales floorspace within the Waterbourne Walk Shopping Centre located within the town centre. A Morrisons foodstore accommodating 2,270m² retail sales floorspace is located to the rear of Lake Street. This is in an edge of centre location. The third foodstore is the Tesco on Vimy Road that is the subject of this extension proposal.

3.2 The Luton and South Beds' Retail Study Update published January 2009 was commissioned in order to provide guidance on the type, size and location of retail provision within the administrative area. It represents up to date retail advice and therefore, in accordance with PPS4, should form the basis for retail assessments submitted in support of retail planning applications within the administrative area (PPS4 Practice Guidance paragraph 7.6).

3.3 The Study describes the town centres of Dunstable and Leighton Buzzard as 'second tier' centres in the study area after Luton which has a wider retail offer and a wider catchment area. They are described as functioning as town centres in terms of the definition of types of centres outlined in PPS6, now PPS4. The Study describes Leighton Buzzard as a historic market town and traditionally an important focus *"for the shopping and service activities of the local population and rural hinterland"*.[3] It describes Leighton Buzzard as having only limited representation of key multiple retailers sighting an under provision in the clothing and footwear sectors *"possibly reflecting the significantly increased offer in the major retail centre of Milton Keynes ... and to a lesser extent Luton"*[4].

3.4 Pedestrian footfall is described as good throughout the centre supported by the twice weekly outdoor market which attracts good levels of pedestrian activity. The Study describes the town centre as benefitting from a very attractive environment with good accessibility and that overall it displays good levels of vitality and viability.

---

[3] Luton and South Beds Retail Study Update, January 2009, paragraph 4.35.
[4] Luton and South Beds Retail Study Update, January 2009, paragraph 4.37.

3.5 Consideration of proposed and recent retail development in surrounding centres led the authors of the Retail Study Update to conclude that there is *"a need for significant retail development in Luton and the other centres in the study area to counter the impact of major retail schemes in competing centres".*[5]

3.6 The Study considers capacity for new convenience and comparison goods floorspace. On the basis of maintaining a constant market share and allowing for over/under trading along with commitments the study finds capacity for approximately 1,300 m² (net) convenience floorspace at 2008. At paragraph 6.25 the study describes the Tesco store as continuing to *"exhibit significant overtrading, and that some additional floorspace (around 1,300m² net) would restore benchmark trading conditions".* The study finds that the capacity for convenience floorspace in Leighton Buzzard / Linslade rises steadily over the period to 2016 to around 2,500m² net suggesting that this continued increase in capacity would be capable of supporting an additional medium-sized foodstore in the town.

3.7 With respect to qualitative deficiencies the study at paragraph 6.34 concludes that *"the edge of centre Tesco is identified as being subject to significant overtrading, pointing towards a qualitative need for improved convenience provision in the central area".* At paragraph 6.13 the study explains that *"that retailers will normally need to rectify significant overtrading"* as it can result in uncomfortable shopping conditions.

3.8 Based on a constant market share approach, the update finds capacity for comparison goods of between 6,900m² and 9,400m² by 2016. The study describes a recognised need to improve the choice, range and quality of comparison goods shopping. At paragraph 7.39 it notes that *"opportunities to develop significant new floorspace within or at the edge of the Leighton Buzzard town centre are somewhat limited"* and that the general ambience and attractiveness of it make the centre suitable for promotion as a centre for niche or specialty shopping in connection with improvements to cultural, leisure and food and drink facilities.

[5] Luton and South Beds Retail Study Update, January 2009, paragraph 5.04.

3.9 Paragraph 8.26 recognises that there are major difficulties in accommodating substantial additional retail floorspace in the town centre. This is due to a combination of the following:

- *"Capacity issues on the local highway network to the historic street pattern.*
- *The physically constricted town centre area surrounded by relatively high value uses, constraining the opportunity of expanding outwards.*
- *A substantial amount of listed buildings and a larger conservation area covering most of the town centre, restricting the potential for large scale redevelopment".*

3.10 Given the identified constraints with respect to accommodating major new floorspace in the town centre Paragraph 8.51 confirms that *"the option of extending the convenience floorspace of the Tesco store [is] an appropriate one".* The study suggests that there may be scope for an *"additional 1,000m² to 1,200m² net convenience floorspace".*

3.11 Given the limited opportunity to provide new comparison retail floorspace within Leighton Buzzard town centre, the study update at paragraph 8.66 suggests that in order to accommodate the capacity for 6,900m² of net comparison floorspace it may ultimately be necessary to require a new large out of centre retail facility. The study identifies two options for accommodating the capacity to 2016. The first is to bring forward the regeneration site to the south of the high street albeit it is recognised that there difficulties in doing so. A mall style development is envisaged. The second is to deliver a proportion of the identified need on *"land to the south of Leighton Road on the opposite side to the existing edge of centre Tesco store"*[6].

3.12 In conclusion, the Retail Study Update finds significant convenience goods capacity and describes the option of extending the existing Tesco store as an appropriate one. In addition, the study has found approximately 6,900m² of comparison goods floorspace capacity (lower end) and recognises that there are constraints with respect to accommodating this within the town centre. The study identifies land to the south of High

[6] Luton and South Beds Retail Study Update, January 2009, paragraph 8.68.

Street as an appropriate location to accommodate some of this need and that the land to the south of Leighton Road should also be considered.

3.13 The analysis within this Retail Assessment will build on the information and analysis that has been established within the Luton and South Beds Retail Study Update (2009).

4. THE PURPOSE OF THE PROPOSED EXTENSION

4.1 The Council's Retail Study has found quantitative capacity for both convenience and comparison goods floorspace in Leighton Buzzard. Both are based on assuming a constant market share where as in reality if improvements are made to local facilities, it follows that more shoppers will be encouraged to shop locally resulting in an improved market share for the town.

4.2 Much of the convenience goods capacity is generated through the significant level of overtrading at the existing Tesco store. The Retail Study has found that the store is trading at a level that is 78% above the company average and that an extension of up 1,200 m^2 would help to address this. Observation of the store confirms that it is very busy and as a result the quality of the shopping environment suffers. The symptoms of overtrading at the level identified by the Council's consultant include:

- Difficulty ensuring that there is sufficient stock on the shelves to keep up with demand from the high number of customers.
- Needing to consider reducing range and choice in order to carry higher amounts of more popular items.
- Conflict between shoppers and employees stocking shelves during busy times
- Difficulty with respect to circulation both within the aisles themselves and at the front of and behind the checkouts – making navigation of the store and manoeuvring of a trolley difficult.
- Insufficient checkouts to meet the needs of customers leading to long queues further exacerbating the congestion in front of the checkouts.

4.3 These symptoms begin to detract from the attractiveness of the facility resulting in shoppers beginning to consider using better facilities in other towns. Much of the quantitative capacity found by the Council is driven by a qualitative need to improve the existing facility.

4.4 The retail study has found capacity for between 6,900m^2 and 9,400m^2 of comparison goods floorspace at 2016. It advises that there is an urgent need to improve retail facilities provided by the centres within the study area in order to counter the impact of major retail schemes in competing centres

4.5 The range and choice of non-food items within the store is limited. Superstores in surrounding towns including at Milton Keynes, Dunstable and Aylesbury are larger and carry a wider range of goods. See Table 1 below.

Table 1 – sample of nearby superstores

Store	**Gross (m^2)**	**Net (m^2)**
Sainsbury's Dunstable	7430	4249
Sainsbury's Milton Keynes	6554	3920
Asda Dunstable	6635	3672
Asda Bletchley	14501	9391
Morrisons Milton Keynes	7432	4801
Tesco Bletchley	-	5327
Tesco Aylesbury	9686	6301
Tesco Dunstable	6041	4690

Source: IGD database September 2010.

4.6 Whilst these stores are primarily food shopping destinations they do accommodate a wider range of comparison goods that contribute to the attractiveness of the store. The range and choice in these stores is greater and in some cases significantly greater than can be found in the Leighton Buzzard store.

4.7 The purpose of the extension is to address an existing need to improve the quality of the retail environment for existing customers as well as to improve the range and choice of both convenience and comparison goods. This will enable the store to maintain and improve its current attraction in the context of improving facilities within surrounding towns.

5. THE GENERAL IMPACT TESTS (PPS4 POLICY EC10.2)

5.1 Policy EC10.2 sets out five general impact considerations that relate to all economic development proposals.

5.2 The first consideration addresses carbon dioxide emissions and climate change. An Environmental Sustainability Statement is submitted in support of the application. The proposal includes a Combined Heat and Power plant (CHP). This will generate energy on site. The extension itself presents an opportunity to improve the energy efficiency of the building. The proposals include rainwater harvesting. Improvements to the drainage system will reduce the surface water discharge rate by 20%. These and other measures that will be introduced through the development of the proposed extension are identified and explained within the accompanying Environmental Sustainability Statement. Improving the sustainability of its operations is one of Tesco's Key commitments. This development will introduce measures designed to reduce carbon dioxide emissions and will minimise the development's vulnerability to climate change.

5.3 The second consideration addresses the matter of accessibility. The site is centrally located between Leighton Buzzard and Linslade. 26% of the population of Leighton Buzzard is within 15 minutes walk of the store with 45% within a 20 minute walk. It is served by an on site bus stop which provides access to two services. A further bus stop is located across Leighton Road which provides access to two further services. The existing cycle infrastructure in the vicinity of the existing store is considered to be very good. Both Vimy Road and Leighton Road are recommended on-road cycle routes. Traffic free routes can be found on the adjacent Grand Union Canal tow path and the nearby River Ouzel. Further detail can be found in the accompanying Transport Assessment along with analysis of the anticipated implications for local traffic levels. The analysis concludes that there will be no additional traffic flow generated by the development when compared to the existing situation. The site is easily accessible by a choice of means of transport including by foot, cycle, bus, train and car.

5.4 The third consideration is whether the proposal secures a high quality and inclusive design taking opportunities available for improving the character and quality of the area. .

The proposal is for an extension to an existing superstore, the design and layout of which is considered in detail within the accompanying Design and Access Statement. This explains that the appearance of the extended store will be significantly improved. Further elements reflecting the local context i.e. Grand Union Canal, are introduced. The elevations have been articulated to improve the visual interest of the building both to the front façade and the elevation facing Leighton Road.

5.5 The proposal includes the introduction of a public realm area at the Leighton Road frontage. The purpose of this space is to improve connectivity between the canal, Leighton Road and the Town Centre. Within the space a café/kiosk is proposed to be operated independently from the store. This will help to activate the space along with the canal side environment helping to encourage movement from the canal towards the town centre. The building along with the proposed landscaping will partly screen the store car park improving the appearance of the site when viewed from Leighton Road.

5.6 It is understood that the future redevelopment of the land area known as Smiths Meadow across Leighton Road will introduce an open area along the frontage which may include leisure and entertainment opportunities (restaurant and canal related). The public realm area at the Tesco frontage is intended to reflect the idea of this more substantial space without detracting from it. It is intended that the space be modest with the expected focus of activity to be on the southern side of Leighton Road.

5.7 The improvements to the appearance of the development and the introduction of the public realm at the site frontage will have a positive impact on the appearance and connectivity of the local area.

5.8 The fourth general impact consideration relates to impact on economic and physical regeneration in the area. The local planning authority has instructed consultants to produce development briefs for two sites. One is for the land across Leighton Road, opposite the Tesco site, known as *"Smith's Meadow"*. The second is within the Town Centre referred to as *"land south of High Street"*, currently the subject of a mixed use allocation within the adopted Local Plan. A strategic allocation to the east of Leighton Buzzard for 2,500 new homes is proposed within the emerging LDF. The proposal will not however have implications for the future delivery of this allocation There is no other known major public or private investment planned for Leighton Buzzard.

5.9 Through discussions with Council officers and their appointed consultants it is understood that the expectation for Smith's Meadow is that it is brought forward as a mixed use development including leisure, educational use, health care and residential development. Regardless of the combination, it is proposed that the perception and use of the Grand Union Canal will be lifted through the development of this site. Providing better access and encouraging greater use of the canal. The development of the site will improve the appearance of Leighton Road and help to better connect Linslade with Leighton Buzzard town centre. The expected uses do not conflict with the proposal to extend the existing Tesco store. The public realm proposed as part of this application is expected to compliment that which is intended to come forward at Smiths Meadow contributing to the regeneration of the immediate area.

5.10 The second potential investment opportunity in Leighton Buzzard is the development of the land lying to the south of High Street. Whilst it is not known what form of development might take place here, it is understood that a precinct of specialist retailers and restaurants / cafes would appeal to the residential retail catchment and visitors to the town alike. It has been suggested that the development could be anchored by a Marks & Spencer Food Hall. The intention is to improve the attractiveness of Leighton Buzzard in order to encourage more people to use the town centre not only for shopping but also for leisure activities maximising the attractive historic environment. The cafes / restaurants will help to invigorate the night time economy.

5.11 The types of retailers and restaurant operators expected to be attracted to the development are distinct from Tesco. There is qualitative difference between the Tesco offer and that of Marks & Spencer and Waitrose. The way in which the former is generally used is also different i.e. mainly for top up shopping rather than main bulk food shopping. These retailers effectively complement each other rather than compete with each other. Bearing in mind that delivery of this site is a medium term prospect, it is clear from the analysis contained within the White Young Green Retail Study Update that there is sufficient capacity to accommodate both a new foodstore anchor (approx 1,000 m²) to this development and the additional convenience floorspace proposed as part of the proposed extension to the existing Tesco. Indeed, the analysis contained within the subsequent sections of this Assessment demonstrates that the proposed extension is likely to attract shoppers that currently use larger foodstores elsewhere. The extended store will contribute to improving the attraction of Leighton Buzzard as a whole which will assist in generating confidence in the town and in so doing help to bring about development of the land to the south of High Street. The two are complimentary. The proposal has the potential to have a positive impact with respect to encouraging the town centre site in particular to come forward.

5.12 The fifth consideration is impact on local employment. Whilst the proposals will result in the loss of the Homebase which currently generates between 35 – 45 jobs, the proposed extension will generate approximately 140 new jobs. There will be a net gain of approximately 95 jobs, a significant contribution to the local pool of employment opportunities within Leighton Buzzard. This is a significant positive impact on local employment opportunities.

5.13 In conclusion, it can be seen that the proposals will result in only positive impact when considered in the context of the five general economic development impact considerations set out in Policy EC10.2 of PPS4. This assessment now considers whether there is an opportunity to accommodate the proposed development in a sequentially preferable location.

6. THE SEQUENTIAL APPROACH TO SITE SELECTION

6.1 The site is described by the Council's Retail Study as edge of centre[7]. Whilst there are roads and a river along the route to the centre, the pedestrian links are flat and provide safe and convenient access such that there are no barriers. The site is well connected with the centre.

6.2 Policy EC14.3 of PPS4 confirms that a sequential assessment is required for planning applications for main town centre uses that are not in an existing centre. This assessment should be carried out in accordance with Policy EC15.

6.3 Policy EC15.1 sets out the matters to be considered as part of a sequential assessment. Point (c) clarifies that it is the *"proposed development"* that is to be tested.

6.4 The proposed development is an extension to an existing store. In order to apply the sequential test it is necessary to understand the purpose of the extension. This is set out in Section 4 above. The Council's retail study has identified significant levels of overtrading at the Tesco store on Vimy Road. The symptoms observed at the store, and which are often apparent if a store is overtrading at the level identified by the Council's consultant, can begin to detract from the attractiveness of the facility, resulting in shoppers choosing to use better more distant facilities in other towns. The Council's research has found that there is a significant need for retail development in the centres within the study area in order to counter the impact of major retail schemes in competing centres. The purpose of the extension is to improve the quality of the current facility as well as to improve the range and choice available to shoppers.

6.5 Given the nature of the proposal i.e. an extension to an existing Tesco store, it is necessary to consider the points concerning flexibility at EC15.1(d) before considering the availability, suitability and viability of candidate sites. Of particular relevance to this proposal is the scope for disaggregation EC15.1 d) iv. The PPS4 Practice Guidance at paragraph 6.30 confirms that *"it is not the purpose of national policy to require*

[7] Luton and South Beds Retail Study Update, January 2009, paragraph 8.68.

development to be split into separate sites where flexibility in their business model and scope for disaggregation has been demonstrated."

6.6 The proposal will accommodate 1,525 m^2 of net retail sales floorspace of which 511 m^2 is to be occupied by convenience goods. Developing another foodstore of approximately 500m^2 would not address the qualitative issues that have been identified at the existing store. It would be wholly inappropriate to accommodate the additional 511m^2 of convenience goods sales floorspace in a location other than that attached to the existing Tesco store. Doing so would not improve the quality of the retail environment or range and choice of goods available to the shopper.

6.7 The remaining 1,014m^2 of the proposed net sales floorspace is to be occupied by comparison goods. The success of this floorspace, in terms of addressing the existing outflow of expenditure on comparison goods, is intrinsically linked with the primary food and grocery offer of the store. It is the food and grocery offer that primarily draws customers to the store. Without it, the non-food floorspace would not be as successful at encouraging those purchasing comparison goods in superstores elsewhere to now use the Tesco store instead, nor would the offer be attractive to those leaving the local area generally to shop elsewhere.

6.8 PPS4 advises that local authorities should take into account *"... any genuine difficulties, which the applicant can demonstrate are likely to occur in operating the applicant's business model ... for example where a retailer would be limited to selling a significantly reduced range of products"* (EC15.2) In this instance, the scale of floorspace is required to improve the quality of the facility and choice capable of being offered which will consequently encourage those that currently use the store to continue to and to attract others that currently look outside of the local area to consider Leighton Buzzard for the purchase of convenience goods and lower to middle order comparison goods. There are also the genuine difficulties for Tesco to operate a separate, non-food retail unit that does not contain a sufficient range of products in order to draw the required number of customers, i.e. it would be providing a reduced range of products which reduces the viability of the trading operation. Disaggregating or reducing the scale of the floorspace will have the effect of reducing the attractiveness of the offer which would not then achieve the qualitative benefits. The proposed floorspace cannot be disaggregated from the existing store and still be capable of delivering the improved quality, range and choice for shoppers.

6.9 Policy EC15.1(d)(i) – (iii) consider scale, format and car parking provision. It is demonstrated that the proposed floorspace cannot be disaggregated from the existing store. The proposal is for an extension, reducing the quantum of floorspace is not going to enable the floorspace to be delivered in a more central location as it cannot be disaggregated. Equally reviewing the format and amount of car parking will not enable it to be accommodated in such a location.

6.10 It would normally now be appropriate to consider a range of potential sites such as land to the south of High Street, however, in this context, it has been demonstrated that the floorspace proposed must be related to the existing in order to deliver the qualitative benefit and wider range and choice.

7. POLICY EC16.1 IMPACT ASSESSMENT

7.1 Policy EC16.1 sets out six impact considerations that are to form an impact assessment for main town centre uses. These are:

a) *"The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.*

b) *The impact of the proposal on town centre vitality and viability, including local consumer choice and the range and quality of the comparison and convenience retail offer.*

c) *The impact of the proposal on allocated sites outside of town centres being developed in accordance with the development plan.*

d) *In the context of a retail or leisure proposal, the impact of the proposal on in-centre trade / turnover and on trade in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to five years from the time the application is made.*

e) *If located in or on the edge of a town centre, whether the proposal is of an appropriate scale (in terms of floorspace) in relation to the size of the centre and its role in the hierarchy of centres.*

f) *Any locally important impacts on centres under Policy EC3.1e".*

7.2 Consideration c) relates to the impact of the proposal on allocated sites for main town centre uses outside of town centres within the catchment. There are none. This test is not therefore relevant in this instance. Consideration f) addresses locally important impacts that are set out within the development plan. There are no such additional impacts that require assessment. This test is not therefore relevant.

7.3 Our assessment under b) above is undertaken first since this provides an understanding of the role and function of the centre, its strengths, weaknesses and opportunity for change and growth in response to the key identified challenges that the centre faces in order to fulfil its role within the retail hierarchy. Our assessment of trade diversion (under d) follows not only from the analysis against issue b) but is also informed by an assessment of a) and e). It is appropriate to consider centre investment, issue a) and to ensure that the scale of the proposed development, issue e), is considered prior to any trade draw analysis as these are important considerations when assessing how patterns of trade are likely to be affected. This part of our assessment is therefore carried out prior to the trade diversion assessment under d).

Centre Vitality and Viability (Policy EC16.1(b)).

7.4 The Council's 2009 Retail Study Update describes Leighton Buzzard as having good levels of vitality and viability consisting of a very attractive environment. The role of the centre is to be the focus for shopping and service activities of the town population and rural communities within the town's hinterland.

7.5 The centre is described as having limited representation of key multiple retailers which does include some clothing and footwear operators albeit the study finds that there is an under provision in this sector. The reason cited is the likely influence of the improving offer in Milton Keynes and to a lesser extent Luton. Representation in the convenience sector is described as reasonable with Waitrose being the only operator geared towards bulk food shopping.

7.6 Whilst the historic environment within the town centre is recognised as a strength, it does limit the ability to introduce new retail floorspace in the form of modern shop units. The study advises that the *"general ambience and attractiveness of the town centre make it suitable for promotion as a centre for niche or specialty shopping in connection with improvements to cultural, leisure and food and drink facilities."*[8]

7.7 A review of the town centre area (as defined by GOAD) reveals that between September 2008 (the date on which the authors of the retail study reviewed the centre) and September 2010 there has been a healthy turnover of operators. A total of 43 changes over the two year period have occurred across the GOAD defined area. Some businesses have vacated units opening elsewhere within the centre. In total eight vacant

[8] Luton and South Beds Retail Study Update, January 2009, paragraph 7.51.

units have become occupied and eight occupied units have become vacant. The net position remains the same. The study reported that there appears to be an under provision of clothing and footwear retailers in the town. Whilst one such outlet has closed down since September 2008, three have opened thereby marginally improving the offer. In terms of convenience operators, the number has remained similar with two specialist confectionary retailers opening for trade.

7.8 This level of turnover of retail outlets is evidence of a dynamic retail environment. Some change is needed within a centre to keep it interesting and attractive to shoppers. There is no evidence to suggest that the centre has become vulnerable over the two year period. The vitality and viability of the centre continues to be strong. There continues to be pressure from new retail development in surrounding towns and no significant improvements to Leighton Buzzard's offer have come about. There remains a need to improve the range, type, quality and choice of goods available in the town.

7.9 The purpose of the proposed extension is to improve the quality of the offer provided by the Tesco store. This will enable an improved range and choice of both convenience goods and comparison goods to be introduced thereby improving the overall Leighton Buzzard offer. The extension will compliment the strategy for Leighton Buzzard identified within the Retail Study i.e. to encourage niche and specialty shopping alongside improvements to the cultural, leisure and food and drink facilities.

7.10 The matter of possible trade diversion is considered below under trade/turnover impact. The above paragraphs provide the context in which this consideration is to be assessed.

Existing, committed and planned public and private investment (Policy EC16.1(a))

7.11 Land to the south of High Street represents a potential investment opportunity within the town centre. This is a medium term prospect and which falls outside of the time period for which PPS4 requires an assessment. However, consideration is given to whether the proposed extension will have implications for this investment coming forward

7.12 The site is allocated under Policy TCS4/7 of the adopted Local Plan (2004). The proposed use is described as a *"mix of town centre uses other than retail, including residential"*. It has not yet come forward. If it were to come forward in manner described by adopted policy, it is clear that the proposed extension will not have implications for the development's viability.

7.13 The Council has appointed consultants to prepare a development brief for the site and for Smiths Meadow, a large site located to the south of the existing Tesco store, across Leighton Road. It is understood that the preferred use of the Smiths Meadow site is likely to be low-medium density residential development, health facilities, education and leisure along the canal side. There is no conflict between the extension proposal and what may come forward on this site. The introduction of a public realm area (see above) as part of the extension proposals is expected to compliment development on the Smiths Meadow site.

7.14 Whilst consultants have been appointed to produce a development brief for the land to the south of High Street which is to undergo a public consultation process, a draft proposing a mix of uses has not been published. Through discussions with the appointed consultants and consideration of their tender document it is apparent that the analysis they have undertaken to date suggests that specialist fashion retailers along with leisure/restaurant outlets would be appropriate operators. This reflects the approach advised by WYG in the Retail Study Update i.e. niche specialty retail and leisure/cultural uses. The retailers identified as examples of those that operate in similar market towns are Crew, White Stuff, Noa Noa, Phase Eight, Fat Face and Jigsaw. All niche fashion retailers. Carluccios and Patisseserie Valerie are identified as leisure operators that would be attractive to residents and visitors alike. A relocated Waitrose store or an M&S Simply Food are identified as potential anchor tenants.

7.15 Whilst it is not clear what the mix of uses will be, consideration has been given to each of the components identified. With respect to the comparison goods retailers, the Council's retail study identifies between 6,900m² and 9,400m² of capacity for this type of floorspace at 2016. It is not anticipated that a development on this site would come forward before 2016 given the known constraints of the site. There is more than sufficient expenditure capacity generated within the catchment to support the additional floorspace proposed at the Tesco store along with the quantum likely to be brought forward at the edge of the town centre. There is no other proposed retail floorspace in or on the edge of the centre that would reduce the capacity identified by the Council's consultants.

7.16 It is important to recognise that there is a qualitative difference between the offer of these types of retailers and that of the clothing and footwear offer found in Tesco. The former offers true comparison shopping where as the Tesco offer is more limited and is at the lower end rather than middle to high end fashion offered by the niche retailers identified.

7.17 There is no potential impact for the type of high quality restaurant/leisure operators identified. The reintroduction of the store café and the café/kiosk at the site frontage are a different offer. The types of operators identified by the consultants are destinations in themselves. The availability of the Tesco car park improves the overall attraction of the town and therefore compliments this type of operator by providing a facility capable of being used for visits to the town centre either solely for this purpose or in conjunction with a visit to Tesco.

7.18 The 2009 Retail Study update identifies capacity for approximately 1,700 m^2 of convenience goods sales floorspace at 2011. The purpose of the proposed extension (which will accommodate 511m^2 of convenience goods sales floorspace) is to improve the quality of the retail environment and to improve the range and choice of goods available. There is a distinction between the offer provided by M&S Simply Food and Waitrose when compared to that of Tesco. It is generally a higher offer. The latter already operates within the centre in the context of the Tesco foodstore. Whilst M&S Simply Food can be used for bulk food shopping it is more commonly used as a top up shopping destination. Given Waitrose exists, the change, if there is to be one, will be the introduction of M&S Simply Food. According to the Council's study there is capacity for a further 1,200m^2, more than sufficient to accommodate an M&S Simply Food. Although both Tesco and M&S Simply Food sell convenience goods, they are complementary in terms of the overall Leighton Buzzard offer.

7.19 No detail of the potential mix of retailing that might come forward on this site is available. The above analysis has considered how an extended Tesco store can co-exist with the mix of uses that are described within material that has been made available. The two are complementary, they represent entirely different retail offers. All elements operate in the context of superstores elsewhere. Indeed superstores are necessary as they anchor town centres keeping people shopping locally. Sufficient expenditure capacity is identified by the retail study to support the quantum of floorspace envisaged in both locations.

Scale (Policy EC16.1(e))

7.20 The South Bedfordshire Local Plan Review (adopted 2004) identifies Leighton Buzzard and Dunstable as the two main town centres in the District. The emerging Luton and South Beds Joint Core Strategy identifies Leighton Buzzard Town Centre as a Major Town Centre. Luton is identified as a Sub Regional Centre. The role of Leighton Buzzard Town Centre is to provide for convenience goods shopping needs as well as for the purchase of lower to middle order comparison goods with the prospect of some higher order goods. The town serves a population of approximately 60,000 people of which 37,000 live within the urban area. The Council's retail study identifies a significant amount of capacity for both convenience and comparison goods floorspace.

7.21 The scale of the proposal is consistent with the role and function of Leighton Buzzard and the catchment area it serves.

Impact on in-centre trade/turnover (Policy EC16.1(d))

7.22 The proposal is for an extension to an existing foodstore which will accommodate 511m^2 of convenience goods sales floorspace and 1,014m^2 of comparison goods sales floorspace. Whilst the Homebase sells predominantly DIY goods it does sell a range of goods that are sold in Tesco superstores. These include small electrical items, homewares and kitchenware. A review of Homebase has found that approximately 400m^2 of the proposed Tesco sales floorspace would be occupied by like for like items. This floorspace therefore already exists in this location and is not new in the context of the current retail market of Leighton Buzzard. The proposal will therefore result in 511m^2 a net increase of convenience sales floorspace and 614m^2 of new comparison goods sales floorspace. The assessment of potential impact on town centre trade/turnover is based on these two figures.

7.23 Subsequent to the publication of the 2009 Retail Study Update there has been no major retail development within Leighton Buzzard. Whilst we have reservations with respect to the constant market share approach and some of the assumptions used by the study's author, we have used it as the basis for assessing whether there is likely to be an impact on Leighton Buzzard Town centre as a result of the extension proposals. The tables have been updated with more recently published data in respect of expenditure growth rates and special forms of trading. Given the currency of the Study it is not considered necessary to review the population figures used. Table 2, Table 3, Table 6 and Table 7c have been updated in respect of convenience goods analysis (see Appendix 1). Table 2, Table 3 and Table 16 have been updated in respect of the comparison goods analysis (see Appendix 3).

Convenience Floorspace

7.24 The convenience goods tables listed above have been updated using the most up to date expenditure information published by MapInfo i.e. the Retail Expenditure Guide 2010/2011. The baseline expenditure per capita figures used by WYG have been grown using real growth rates to 2009 and then projected growth rates to 2031. The existing store has, and the store as extended will continue to have, home delivery facilities. This facility relies on sourcing products from the shop floor. Much of the expenditure that forms what is known as Special Forms of Trading is accounted for by home delivery sales operated in this manner. Given this form of trading is operated from the Tesco store it is not necessary to make an allowance for it. Nevertheless, to maintain consistency with the WYG analysis 1.3% is allowed for as per the MapInfo Expenditure Guide.

7.25 It is evident from the tables that whilst the updated inputs have reduced the amount of convenience goods expenditure generated, there continues to be capacity to support new floorspace in Leighton Buzzard. This is based on the constant market share approach used by WYG. Applying the same trading density figure used within the study derives capacity for approximately 1,150m² at 2011 and 1,475m² at 2016 (See Table 5, Appendix 1). A vast majority of this capacity is generated by overtrading at the Tesco store on Vimy Road. Consideration of Table 4 at Appendix 1 confirms that the store is trading at a level 63% higher (£18,552 per m²) than the company average. Observation of the trading conditions confirms this. See paragraphs above.

7.26 Where there is evidence of overtrading it is generally accepted that extensions will achieve a sales density of around a quarter of that of the existing floorspace. At the Kidlington call in inquiry, July 2005, the methodology of applying a third in these circumstances was accepted by both the Inspector and the First Secretary of State (Inspector's Report, paragraph 6.13, July 2005). Applying this approach to the current trading density of Tesco in Leighton Buzzard gives a figure of £6,184 per m². £3.16m is therefore needed to support the proposed convenience goods floorspace (511 m²). The capacity analysis contained in Table 5 of Appendix 1 i.e. updated WYG Table 7c, identifies residual expenditure having allowed for overtrading/undertrading at all stores in the town of £13.69m at 2011 and £17.68m at 2016.

7.27 The Retail Study Update has found that Leighton Buzzard performs strongly in terms of retaining a healthy amount of locally generated convenience goods expenditure i.e. Zone 7 which is tightly drawn around the Leighton Buzzard urban area. Improving local provision will however encourage those that that live in nearby villages and the surrounding rural area and who ought to be looking to Leighton Buzzard for convenience goods, to use a more local store rather than larger stores in more distant towns (see Retail Study Update 2009 Zone Map at Appendix 2). Whilst the zones outside of Leighton Buzzard are widely drawn, it is evident that Leighton Buzzard could do better in terms of attracting shoppers from the Zone 8 area in particular.

7.28 The Retail Study Update finds that Leighton Buzzard attracts 19.3% (Appendix J, Table 4) of Zone 8 main food shopping trips. It is not unreasonable to assume a 4% increase bearing in mind the zone covers a majority of the rural hinterland surrounding the town. The survey informing the study found that 67.2% of expenditure is spent as part of a main food shopping trip. Therefore £78.05m of the convenience expenditure generated in this zone is attributed to main food shopping (£116.15m x 0.672) (See Appendix 1 Table 3 of this Assessment). Improving Leighton Buzzard's share from this zone by 4% will generate £3.12m. At 2011 there would be £16.81m available to support the proposed floorspace which is expected to accommodate approximately £3.16m leaving £13.65m to support floorspace that might come forward elsewhere.

7.29 The attraction of this new expenditure along with the existing capacity identified is more than sufficient to support the proposed floorspace. The proposal will not draw expenditure from the town centre and therefore there will be no impact on the turnover of town centre convenience retailers.

Comparison Floorspace

7.30 With respect to the comparison goods tables, these too have been updated using information published within the MapInfo Retail Expenditure Guide 2010/2011. The baseline expenditure per capita figures have been grown using real growth rates to 2009 and then projected growth rates to 2031. An allowance is made for Special Forms of Trading of 7.4% as per the MapInfo publication.

7.31 A second version of WYG's Table 16 is included within the analysis at Appendix 3. This Table considers a marginal improvement of the market share of Leighton Buzzard. It is reasonable to assume that improving local provision will encourage more people to shop locally thus improving the level of expenditure retention. A small increase of 0.1% is allowed for at 2016. Tesco's offer will have been improved in terms of the range and choice available and the development of land south of High Street will be likely to come online during the years between 2016 and 2021.

7.32 The updated tables confirm that there continues to be capacity for new comparison goods floorspace in Leighton Buzzard when a constant market share is applied. The analysis finds capacity for approximately 1,300m² at 2011 and approximately 5,100m² at 2016. If an allowance is made for a marginal increase in Leighton Buzzard's market share the capacity to accommodate new floorspace at 2016 increases to approximately 6,700m².

7.33 The proposed extension will accommodate 1,014m² of comparison goods sales floorspace. As is discussed above, a review of Homebase has found that approximately 400m² of the proposed Tesco sales floorspace would be occupied by like for like items.

Therefore new comparison goods floorspace (of the type operated by Tesco) in this location will total only 614m².

7.34 The types of goods to be sold include clothing and footwear, health and beauty, small electrical appliances, homewares, kitchen utensils, cutlery and crockery. The range and choice of goods currently sold in the store is limited. The additional space will allow the store to carry greater choice and a wider range.

7.35 It is clear from the survey results that have informed the Retail Study Update that significant amounts of expenditure spent on lower and middle order comparison goods is leaving the local area. Consideration of Zone 7, the immediate Leighton Buzzard urban area, reveals that only 7.9% of local people buy clothing and footwear in Leighton Buzzard, only 26.5% buy electrical goods and approximately 48% buy other goods such as books, toiletries, jewellery, toys and gifts. Whilst Zone 8 is widely drawn some of the population residing in this zone are very close to Leighton Buzzard yet very few respondents identified the town as their normal destination for clothing and footwear (2.5%), electrical items (1.5%) and other goods (5.1%). Whilst Leighton Buzzard cannot be expected to compete with Luton or Milton Keynes it is evident that there is scope to improve the level of local expenditure retained in the town.

7.36 The 614m² of new comparison goods floorspace would accommodate approximately £3.68m on the basis that it will trade at approximately £6,000 per m². This is approximately 80% of the capacity identified by WYG at 2011 on the basis of there being no improvement in terms of Leighton Buzzard's market share, and less than 20% of the capacity at 2016. There is sufficient capacity generated through expenditure and population growth to support the proposed floorspace without there being implications for the town centre turnover. On the basis of the updated Retail Study analysis there would still be approximately £15.14m of expenditure available which is assessed as being capable of accommodating 4,100m² of sales floorspace.

7.37 The improved convenience offer will encourage shoppers who currently use larger stores in surrounding towns to look more locally (see analysis above). These new convenience shoppers will generate some new comparison goods expenditure both for the extended store and the town centre.

7.38 Consideration of the analysis contained within the Retail Study Update and the updated tables at Appendix 3 to this Assessment reveals that the comparison goods floorspace within Leighton Buzzard accommodates approximately £73.46m per annum. The proposed floorspace will accommodate some of the expenditure growth identified and will attract some new expenditure currently being spent in other towns and large stores in surrounding areas. The paragraphs above explain that it is reasonable to assume that improved choice and range introduced by the Tesco extension along with the future development of land south of High Street will improve the attraction of Leighton Buzzard as a comparison goods shopping destination. 0.1% improvement is considered a reasonable assumption following implementation of both developments. If half of this is attributable to the improved offer at the Tesco store, this would represent £2.36m at 2011. Not all of this would be spent in Tesco. Having been attracted to the improved store for convenience shopping, new shoppers are likely to visit the town centre as well. There is a potential benefit to be realised through the attraction of new shoppers.

7.39 This expenditure coupled with the capacity identified at Table 4 of Appendix 3 is more than sufficient to support the proposed floorspace. Impact on town centre turnover will be minimal and needs to be balanced against the potential benefit derived through the attraction of new shoppers to the town.

Homebase

7.40 The extension to the existing Tesco necessarily requires the removal of the existing Homebase. This facility does not have policy protection. It is however part of the overall Leighton Buzzard offer. Consideration is therefore given to the potential implications its closure might have for the town centre. Closure of the store could potentially result in those using it leaving the town in order to purchase DIY items elsewhere and in doing so visit other shops at the same time. In order to determine the implications of the closure of Homebase, consideration needs to be given to how stores such as this are used.

7.41 The retail survey informing the Retail Study Update reveals that almost 50% of respondents last used the Homebase for DIY goods, hardware or decorating purchases. Almost 30% said they used Leighton Buzzard Town Centre. These types of goods are generally purchased whilst carrying out home maintenance or home decorating.

Purchases are project based. Whilst carrying out a project, a shopper may visit a DIY store relatively frequently but only over a limited time period e.g. over a month or six weeks. Unlike foodstores, DIY stores do not significantly alter shopping patterns. Generally food shopping takes place on a weekly basis. Changes to local provision can therefore have a profound effect on the way in which people do their shopping, not only for food but for non-food goods as well. DIT stores do not have the same level of influence over shopping patterns.

7.42 In the context of Leighton Buzzard, the closure of Homebase will result in more shoppers visiting the town centre stores for DIY, hardware and decorating supplies. A clear benefit in terms of town centre turnover. Those that may prefer to use a Homebase of B&Q elsewhere may look elsewhere but a trip to another town for this reason would be purpose driven and infrequent. It would not result in a shopper then carrying out all of their other shopping (neither as part of that trip or on separate trips). The increased attraction of the improved Tesco store keeping more people shopping locally for a more frequent shopping trip coupled with the diversion of more DIY related spend to the Town Centre through the closure of Homebase, outweighs the loss of this facility to the wider Leighton Buzzard offer. There will be a net benefit for the town centre.

7.43 It must also be noted that the market will respond. The lack of presence of a national DIY retailer in the town is very likely to result in the introduction of a new Homebase or potentially another large footprint retailer with which it competes.

8. SATISFYING POLICY EC17

8.1 Policy EC17.1 advises that applications for main town centre uses that are not in an existing centre should be refused planning permission where:

- the applicant has not demonstrated compliance with the requirements of the sequential approach; or
- there is clear evidence that the proposal is likely to lead to significant adverse impacts in terms of any one of the impacts set out in Policies EC10.2 and EC16.1.

8.2 With respect to the sequential approach, it has been demonstrated that the proposed floorspace cannot be disaggregated from the existing store. The proposed convenience floorspace must be associated with the existing floorspace to deliver the improved quality range and choice. The proposed comparison goods floorspace is reliant upon the primary attraction of the convenience offer. If it were to be disaggregated the operator would have genuine difficulties operating the floorspace as it would be *"limited to selling a significantly reduced range of products"*[9] without the primary attraction of the convenience floorspace making it unviable. The proposed development complies with the sequential approach.

8.3 The preceding analysis has demonstrated that there will be no significant adverse impact in terms of assessment of the proposal in the context of the considerations set out in Policies EC10.2 and EC16.1. The analysis has demonstrated that there will be positive impact with respect to;

- limiting carbon dioxide omissions (EC10.2a));
- delivering high quality design along with a public realm area that will improve the character and quality of the local area and the way it functions (EC10.2b));

[9] PPS4 Policy EC15.2.

- generating approximately 95 new jobs, therefore having a positive impact on local employment (EC10.2e));

8.4 Analysis of the scheme in the context of Policy EC16.1 has shown that there will be no significant impact with respect to the relevant considerations. The improved store will attract new main food shoppers to the town introducing the potential for spin off benefits for town centre traders. There is therefore a potential positive impact to be realised through attraction of new shoppers to the Tesco store and subsequently the town centre.

8.5 Policy EC17.2 then requires planning applications to be determined by taking account of:

- Positive and negative impacts and any other material considerations; and
- the likely cumulative effect of recent permissions, development under construction and completed developments.

8.6 The proposal accommodates some of the capacity that has been identified by the Council's retail consultants. There will be positive impacts as a result of the development. The proposal is an extension and will not result in the introduction of a new facility that will have a fundamental impact on the existing retail dynamic. There will be no trade draw from the town centre in terms of convenience goods. The improved facility will attract new main food shoppers which has the potential to deliver spin off benefits for the town centre through the introduction of new comparison goods expenditure. The closure of the Homebase will also result in a diversion of some of this spend to the town centre. The proposal is considered to have an overall positive impact on the local area when assessed in the context of the considerations set out EC10.2 and EC16.1.

8.7 With respect to EC17.2b), there are no recent permissions, developments under construction and completed developments. There is no cumulative effect to be considered.

8.8 This assessment has demonstrated that there will be no significant adverse impacts as a result of permitting the proposed extension. It identifies a number of positive impacts including limiting carbon dioxide omissions, improving the appearance of the site and the way it functions with the surrounding land uses. In terms of in centre turnover, this will at least be neutral and likely to result in positive impact.

8.9 The proposed development is consistent with the development plan, will not have an impact on the vitality and viability of Leighton Buzzard and is therefore in accordance with the Development Plan and national policy.

Table 1 - Population

Zone	2008	2011	2016	2021	2026	2031
1	196,756	198,651	203,410	212,233	220,420	225,287
2	74,132	76,651	79,836	81,752	84,736	87,720
3	45,592	46,511	47,397	48,535	50,306	52,078
4	43,083	43,581	43,726	44,775	46,410	48,044
5	25,827	26,349	27,682	32,217	33,561	34,562
6	27,968	28,808	29,500	30,208	31,311	32,413
7	34,512	35,364	37,976	39,301	39,965	39,713
8	70,424	71,759	72,907	74,657	77,382	80,107
9	58,572	61,081	64,047	65,584	67,978	70,372
10	96,779	99,288	102,445	104,904	108,733	112,562
11	136,659	138,209	140,094	143,456	148,692	153,929
12	269,145	273,960	276,900	283,546	293,895	304,244
13	161,019	162,568	163,400	167,322	173,429	179,536
14	41,083	42,487	43,932	44,986	46,628	48,270
Total	1,281,551	1,305,267	1,333,252	1,373,476	1,423,446	1,468,837

Notes:

Population projections to 2016 from MapInfo

Population projections beyond 2016 for Zones 1,5,based on projected housing growth (see 2009 retail Study Update Appendix J)

Population projections for remaining zones based on average Bedfordshire population growth for the periods 2016-2021 and 2012-2031 (2.4% and 7.3% respectively) (from Bedfordshire County Council Population Estimates and Forecasts 2007)

Table 2 - Updated WYG Table 2 - Convenience goods expenditure (per capita)

Zone	2008	2011	2016	2021	2026	2031
1	1,447	1,419	1,447	1,477	1,506	1,537
2	1,633	1,602	1,634	1,667	1,701	1,735
3	1,793	1,758	1,794	1,830	1,867	1,904
4	1,594	1,563	1,595	1,627	1,660	1,693
5	1,533	1,504	1,534	1,565	1,596	1,629
6	1,676	1,644	1,677	1,711	1,746	1,781
7	1,603	1,572	1,604	1,637	1,670	1,703
8	1,649	1,618	1,650	1,684	1,718	1,752
9	1,686	1,654	1,687	1,721	1,756	1,791
10	1,614	1,583	1,615	1,647	1,681	1,714
11	1,586	1,556	1,587	1,619	1,652	1,685
12	1,682	1,650	1,683	1,717	1,752	1,787
13	1,643	1,611	1,644	1,677	1,711	1,745
14	1,685	1,653	1,686	1,720	1,755	1,790

Notes:
2005 per capita expenditure figures from MapInfo
Real growth of 0% 05-06, 0.4% 06-07, -1.5% 07-08 and -2.7% 08-09 - MapInfo Retail Expenditure Guide 2010/2011
Forecast growth rate of 0.4% 09-31 - MapInfo Retail Expenditure Guide 2010/2011
Special forms of trading excluded at 1.3% - MapInfo Retail Expenditure Guide 2010/2011
2005 prices

Table 3 - Updated WYG Table 3 - Total convenience goods expenditure

Zone	2008	2011	2016	2021	2026	2031
1	284,626,183	281,849,900	294,420,464	313,384,253	332,034,965	346,208,334
2	121,062,450	122,772,708	130,452,180	136,276,046	144,097,903	152,179,757
3	81,729,312	81,775,864	85,013,693	88,809,950	93,906,347	99,174,043
4	68,659,530	68,119,640	69,724,189	72,836,300	77,018,032	81,337,079
5	39,595,425	39,620,090	42,463,652	50,416,599	53,578,667	56,289,117
6	46,883,309	47,364,201	49,479,772	51,688,772	54,656,239	57,720,568
7	55,332,022	55,609,381	60,920,640	64,317,241	66,722,481	67,638,447
8	116,157,789	116,087,188	120,322,184	125,694,298	132,908,744	140,362,998
9	98,748,386	101,001,159	108,040,746	112,863,951	119,342,270	126,035,930
10	156,186,032	157,158,577	165,424,815	172,810,649	182,729,383	192,977,814
11	216,736,745	214,986,356	222,311,881	232,236,469	245,565,792	259,339,864
12	452,725,262	451,976,480	466,036,786	486,843,450	514,785,811	543,656,966
13	264,502,360	261,919,453	268,567,409	280,558,136	296,660,760	313,298,628
14	69,223,640	70,214,792	74,066,545	77,372,575	81,813,510	86,402,061
	2,072,168,444	2,070,455,789	2,157,244,956	2,266,108,689	2,395,820,903	2,522,621,606

Notes:
2005 prices

Table 4 - Updated WYG Table 6 - Adjustments to WYG's convenience retail capacity model (overtrading at Principal Stores) for Leighton Linslade only.

	Estimated total turnover (£)	Net Floorspace (sqm)	Net convenience goods floorspace (sqm)	Current sales density (£/sqm)	Average sales density (£/sqm)	Benchmark turnover	% Difference from average sales density	Total turnover difference (£)
Leighton Linslade Town Centre								
Waitrose	14,688,000	1,286	1,000	14,688	10,872	10,871,640	135%	3,816,360
Iceland	1,728,000	557	450	3,840	5,726	2,576,902	67%	- 848,902
Leighton Linslade Other								
Morrisons	21,888,000	2,270	2,050	10,677	11,552	23,682,549	92%	- 1,794,549
Tesco, Vimy Road	48,960,000	3,105	2,639	18,552	11,356	29,969,673	163%	18,990,327
Co-op	480,000	948	850	565	6,828	5,803,800	8%	- 5,323,800
Aldi	3,936,000	1,250	1,000	3,936	5,000	5,000,000	79%	- 1,064,000
Leighton Linslade Total								13,775,436

Notes

Estimated Total Turnover derived from WYG Table 6 and adjusted to account for lower expenditure pool.

Net floorspace figures from WYG Table 6 apart from Tesco which is adjusted to reflect the relevant controls and Morrisons to reflect 2007 extension permission which limits the sales floorsoace to 2,270sqm

Net convenience floorspace taken from WYG Table 6 except in the case of Tesco which is adjusted to reflect relevant controls

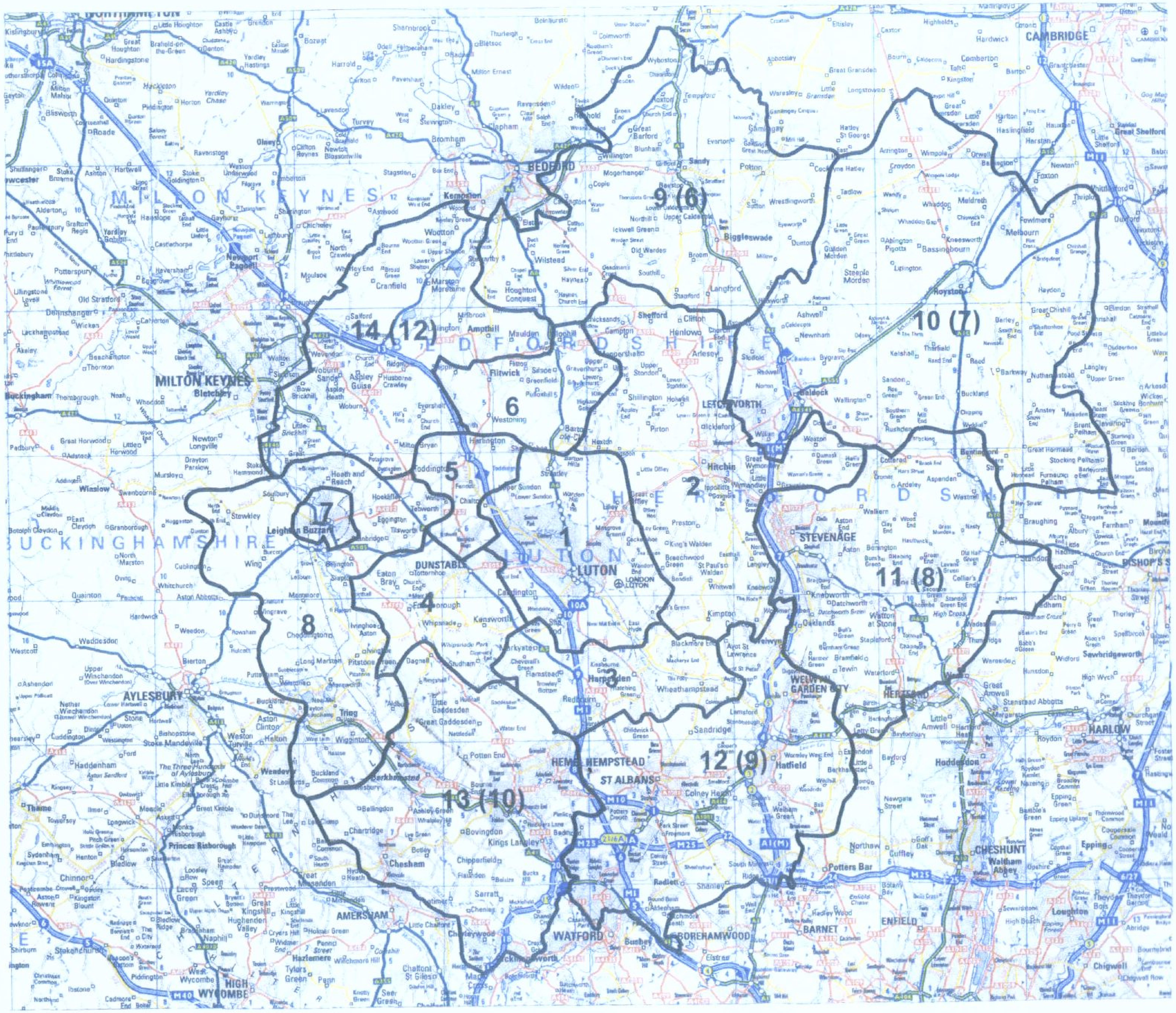
Sales Densities based on company average trading performance taken from Retail Rankings 2010

2005 Prices

Table 5 - Updated WYG Table 7c - Convenience floorspace capacity in Leighton Linslade

	2008	2011	2016	2021	2026	2031
Available Convenience Goods Expenditure	2,072,168,444	2,070,455,789	2,157,244,956	2,266,108,689	2,395,820,903	2,522,621,606
Actual Turnover of facilities in Leighton Linslade (2005)	95,319,748	95,319,748	95,319,748	95,319,748	95,319,748	95,319,748
Market share 2005 (%)	4.6%	4.6%	4.6%	4.6%	4.6%	4.6%
Turnover potential based on Market Share	95,319,748	95,240,966	99,233,268	104,241,000	110,207,762	116,040,594
Residual Expenditure	-	- 78,782	3,913,520	8,921,251	14,888,013	20,720,845
Allowance for overtrading/undertrading	13,775,436	13,775,436	13,775,436	13,775,436	13,775,436	13,775,436
Developments / commitments	0	0	0	0	0	0
Residual Expenditure	13,775,436	13,696,654	17,688,956	22,696,687	28,663,449	34,496,282
Assummed trading Density of New Sales Floorspace	12,000	12,000	12,000	12,000	12,000	12,000
Floor Space Capacity (sqm)	1,148	1,141	1,474	1,891	2,389	2,875

Notes
Available Expenditure from Table 3 (MRPP updated)
Actual Turnover of Facilities from WYG Table 5
Assummes no increase in floorspace efficiences
Allowance for overtrading taken from Table 6 (MRPP updated)
2005 prices



LUTON AND SOUTH BEDFORDSHIRE RETAIL STUDY

PLAN SHOWING SURVEY ZONES

Ref : A025299

Scale : NTS

Date : OCTOBER 2005

White Young Green Planning
Ropemaker Court
12 Lower Park Row
Bristol BS1 5BN

Tel: 0117 925 4393
Fax: 0117 925 4239
Email : bristol.planning@wyg.com

Table 1 - Population Figures

Zone	2008	2011	2016	2021	2026	2031
1	196,756	198,651	203,410	212,233	220,420	225,287
2	74,132	76,651	79,836	81,752	84,736	87,720
3	45,592	46,511	47,397	48,535	50,306	52,078
4	43,083	43,581	43,726	44,775	46,410	48,044
5	25,827	26,349	27,682	32,217	33,561	34,562
6	27,968	28,808	29,500	30,208	31,311	32,413
7	34,512	35,364	37,976	39,301	39,965	39,713
8	70,424	71,759	72,907	74,657	77,382	80,107
9	58,572	61,081	64,047	65,584	67,978	70,372
10	96,779	99,288	102,445	104,904	108,733	112,562
11	136,659	138,209	140,094	143,456	148,692	153,929
12	269,145	273,960	276,900	283,546	293,895	304,244
13	161,019	162,568	163,400	167,322	173,429	179,536
14	41,083	42,487	43,932	44,986	46,628	48,270
Total	1,281,551	1,305,267	1,333,252	1,373,476	1,423,446	1,468,837

Notes
Population projections to 2016 from MapInfo
Population projections beyond 2016 for Zones 1,5,based on projected housing growth (see 2009 retail Study Update Appendix J)

Population projections for remaining zones based on average Bedfordshire population growth for the periods 2016-2021 and 2012-2031 (2.4% and 7.3% respectively) (from Bedfordshire County Council Population Estimates and Forecasts 2007)

Table 2: Updated WYG Table 2 - Comparison goods expenditure (per capita)

Zone	2008	2011	2016	2021	2026	2031
1	2,870	3,077	3,694	4,451	5,363	6,463
2	3,434	3,682	4,420	5,326	6,417	7,733
3	3,932	4,216	5,061	6,098	7,348	8,855
4	3,280	3,516	4,221	5,086	6,129	7,385
5	3,138	3,364	4,038	4,866	5,863	7,065
6	3,572	3,830	4,597	5,539	6,675	8,043
7	3,364	3,606	4,329	5,216	6,286	7,574
8	3,463	3,713	4,457	5,371	6,472	7,799
9	3,517	3,771	4,526	5,454	6,572	7,919
10	3,373	3,616	4,340	5,230	6,302	7,594
11	3,302	3,540	4,250	5,121	6,171	7,436
12	3,565	3,822	4,588	5,529	6,662	8,028
13	3,431	3,678	4,415	5,320	6,411	7,725
14	3,537	3,792	4,552	5,485	6,610	7,965

2005 per capita expenditure figures from MapInfo
Real growth of 4.9% 05-06, 2.8% 06-07, 3.8% 07-08 and -0.3% 08-09 - MapInfo Retail Expenditure Guide 2010/2011
Forecast growth rate of 3.7% 09-15 and 3.8% 16-31 - MapInfo Retail Expenditure Guide 2010/2011
Special forms of trading excluded at 7.4% - MapInfo Retail Expenditure Guide 2010/2011
2005 prices

Table 3 - Updated WYG Table 3 - Total comparison goods expenditure

Zone	2008	2011	2016	2021	2026	2031
1	564,692,425	611,262,008	751,313,733	944,601,668	1,182,152,651	1,455,946,651
2	254,581,610	282,222,613	352,845,945	435,383,048	543,785,792	678,336,658
3	179,280,374	196,088,649	239,861,204	295,972,225	369,660,016	461,130,402
4	141,299,138	153,243,986	184,560,338	227,730,390	284,435,455	354,811,827
5	81,033,205	88,635,125	111,776,773	156,756,648	196,771,652	244,181,790
6	99,897,397	110,321,089	135,606,288	167,327,203	208,991,337	260,697,786
7	116,086,191	127,533,561	164,393,523	205,005,660	251,205,322	300,793,524
8	243,897,279	266,449,749	324,952,995	400,966,988	500,800,555	624,715,219
9	205,997,614	230,319,626	289,891,832	357,702,401	446,764,961	557,310,703
10	326,397,045	359,016,593	444,652,671	548,667,144	685,275,246	854,834,895
11	451,259,347	489,301,974	595,350,274	734,612,827	917,517,086	1,144,547,374
12	959,536,963	1,047,165,250	1,270,467,029	1,567,655,880	1,957,970,643	2,442,433,613
13	552,425,300	597,976,572	721,462,127	890,228,103	1,111,876,984	1,386,990,010
14	145,316,587	161,124,572	199,985,756	246,764,247	308,204,100	384,464,009
Total	4,321,700,476	4,720,661,367	5,787,120,488	7,179,374,431	8,965,411,800	11,151,194,462

Notes:
2005 prices

Table 4 - Updated WYG Table 16 Comparison floorspace capacity in Leighton Linslade

Zone	2,008	2,011	2,016	2,021	2,026	2,031
Available Expenditure (£m)	4,321,700,476	4,720,661,367	5,787,120,488	7,179,374,431	8,965,411,800	11,151,194,462
Turnover of facilities (£)	73,468,908	75,695,089	79,556,300	83,614,471	87,879,649	92,362,394
Market Share 2008 (%)	1.7%	1.7%	1.7%	1.7%	1.7%	1.7%
Turnover potential based on market share (£)	73,468,908	80,251,243	98,381,048	122,049,365	152,412,001	189,570,306
Residual expenditure (£m)	-	4,556,154	18,824,749	38,434,895	64,532,352	97,207,912
Commitments	-	-	-	-	-	-
Expenditure Capacity (£m)		4,556,154	18,824,749	38,434,895	64,532,352	97,207,912
Sales density for new floorspace (£/sqm)		3,500	3,679	3,866	4,063	4,271
Floorspace Capacity (sqm)		1,302	5,117	9,941	15,881	22,762

Notes:
No identified commitments
Assumes that all floorspace improves its trading performance by 1% per annum
Assumes expenditure growth as per MapInfo Retail Expenditure Guide 2010/2011
2005 prices

Table 4a - Comparison floorspace capacity in Leighton Linslade (assuming .1% improved expenditure retention @ 2016)

Zone	2,008	2,011	2,016	2,021	2,026	2,031
Available Expenditure (£m)	4,321,700,476	4,720,661,367	5,787,120,488	7,179,374,431	8,965,411,800	11,151,194,462
Turnover of facilities (£)	73,468,908	75,695,089	79,556,300	83,614,471	87,879,649	92,362,394
Market Share 2008 (%)	1.7%	1.8%	1.8%	1.8%	1.8%	1.8%
Turnover potential based on market share (£)	73,468,908	82,611,574	104,168,169	129,228,740	161,377,412	200,721,500
Residual expenditure (£m)	-	6,916,484	24,611,869	45,614,269	73,497,763	108,359,106
Commitments	-	-	-	-	-	-
Expenditure Capacity (£m)		6,916,484	24,611,869	45,614,269	73,497,763	108,359,106
Sales density for new floorspace (£/sqm)		3,500	3,679	3,866	4,063	4,271
Floorspace Capacity (sqm)		1,976	6,691	11,798	18,088	25,373

Notes:
No identified commitments
Assumes that all floorspace improves its trading performance by 1% per annum
Assumes expenditure growth as per MapInfo Retail Expenditure Guide 2010/2011
Assumes a 0.1% increase in retention due to improved provision both because of the improved Tesco offer and new retail facilities introduced on land south of High Street by 2016.
2005 prices