# Appeal Decision

Inquiry opened on 11 February 2003
Site visit made on 13 February 2003

by John L Gray DipArch MSc Registered Architect
an Inspector appointed by the First Secretary of State

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Date
11 MAR 2003

**Appeal Ref. APP/N0220/A/02/1095401**
**Tesco Stores Limited, Vimy Road, Leighton Buzzard**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Tesco Stores Limited against the decision of South Bedfordshire District Council.
- The application (ref. SB/TP/2000/0401), dated 27 April 2000, was refused by notice dated 23 January 2002.
- The development proposed is an extension to the existing store and ancillary works.

**Summary of Decision: the appeal is dismissed.**

## The Proposal

1. The existing Tesco store has a floor area of 4,426sqm gross, 2,735sqm net. Condition 13 attached to the planning permission for the store, granted in 1989, restricted sales to 'food and drink and other convenience goods (as defined by the Unit for Retail Planning Information)' – because the Council was not satisfied that unrestricted retailing 'would not have an adverse effect on the viability of the Leighton Buzzard town centre'. Tesco has been in breach of that condition – though that is not a matter before me in this appeal. A separate planning permission enabled the use of 25sqm as a pharmacy.

2. The proposal is to extend the store by 1,357sqm gross, giving an additional 1,110sqm net. That is a 30% gross increase, 40% net. The extension is to enable an additional 486sqm convenience sales floorspace and 526sqm durable sales floorspace, plus 98sqm non-sales floorspace and 247sqm for storage and offices. Existing durable sales floorspace was given as 163sqm, which does not include the pharmacy (and, as it transpired late in the inquiry, apparently does not include healthcare and baby goods). The location for the extension means that the present 464 car parking spaces would be reduced to 412.

## Planning Policy

3. The Development Plan for the area comprises the *Bedfordshire Structure Plan 1997* and the *South Bedfordshire Local Plan 1995*. In the Structure Plan, Policy 50 identifies Leighton Buzzard as a major town centre and Policy 51 sets out a number of measures by which the vitality and viability of existing centres will be maintained and strengthened. In the Local Plan, Policy SH7 sets criteria against which proposals for out-of-town and out-of-centre food and non-food retail developments will be considered.

4. The emerging First Review of the Local Plan is well advanced, Proposed Modifications being on deposit at the time of the inquiry. Policy TCS6, the proposed amalgamation of Policy SH6 (referred to in the reason for refusal) and Policy TC6, states that 'applicants for planning permission for major retail ... developments, or extensions to existing developments outside the town centres, ... must demonstrate that there are no suitable town

centre sites … or edge of centre sites …'; out-of-centre development will be permitted only if criteria on need, vitality and viability, character and environment, accessibility, car journeys and the transport network have all been met; where possible proposals should be combined with existing out-of-centre development.

5. The *Leighton Buzzard Town Centre Strategy*, approved in 1997, advocates (amongst other things) encouraging a range of uses in Bridge Street (at the west end of the town centre, on the route towards Tesco) and creating 'a continuous attractive route between Tesco and Bossard Centre' (now refurbished and renamed the Waterborne Centre).

6. National policy guidance is to be found in PPG6 *Town Centres and Retail Developments* and PPG13 *Transport*. PPG6 post-dates the Local Plan. PPG13 post-dates both Plans. The Local Plan review clearly attempts to translate national guidance into local policy – but it has yet to be adopted. It is this chronology, and the consequent weight attributable to the various policy statements, that influences my framing of the main issue.

**Main Issue**

7. I consider that the main issue in the appeal is whether the proposed introduction of durable goods sales would be consistent with planning policy guidance in PPG6, as subsequently elaborated upon by Ministerial and Governmental statements.

**Reasoning**

8. The Council accepts that the store is over-trading to a significant degree. It acknowledges that some additional 'elbow room' would ease congestion in the store and contribute to a better shopping environment. It accepts that additional convenience goods sales would not have an unacceptable impact – because it would fall on the other large convenience goods retailers (primarily Safeway and Waitrose), who are also over-trading.

9. There is no highways objection – not to the reduced car parking provision, which would be in line with the guidance in PPG13, nor to vehicular access, nor to the impact of additional traffic on Leighton Road east and west of the Vimy Road junction. The S106 obligation includes measures that address the County Council's concerns as highway authority – widening the exit lanes from Vimy Road and linking the Vimy Road traffic signals with those at Wing Road and those shortly to be installed at Bridge Street.

10. Nor is there any objection to the design or appearance of what is proposed – although conditions are suggested to control materials and landscaping.

11. The reason for refusal of the application refers specifically to the comparison goods impact it is believed would arise from the proposed extension. The types of goods that would be sold were described at the inquiry as healthcare products (soap to cosmetics), household goods (such as kitchen hardware, bathroom accessories and cleaning items, including brooms and buckets), books, CDs, toiletries (including first aid items), a limited range of clothing and electrical items (the latter including kettles, irons, CD players and occasionally TVs and computers in very limited ranges) and seasonal goods. Not all of these are naturally associated with the offer of a food store. On the other hand, as I saw at the Asda store in Dunstable (and have noticed elsewhere), clothing, electrical items, gardening goods, books and CDs are increasingly commonly to be found in superstores, even if in modest quantities and apparently ancillary to the main food offer. On the other hand, the Asda store looks to be at least on the edge of, if not within, Dunstable town centre – which may have influenced the terms on which planning permission was granted.

12. As I see it, therefore, the main issue comes down to whether it would be appropriate to have about 690sqm of floorspace at the Tesco store (163sqm existing plus 526sqm proposed) devoted to selling the durable goods described above. The location of the store in relation to the town centre, the need for the proposal and the sequential test are, in my opinion, matters reasonably to be addressed in assessing the likely impact.

*Location and linked trips*

13. At present, the store entrance is 400m from the town centre, 620m from the primary retail frontage. As proposed to be extended, the distances would be 373m and 593m respectively. In terms of the guidance in PPG6, which suggests 200-300m, the store's location is out-of-centre rather than edge-of-centre. And, quite apart from the distance the store is set back from Leighton Road, there is also a clear visual break between the edge of the town centre, in Bridge Street, and the Vimy Road junction. The route is flat – and thus easy to walk. In Bridge Street, it is pleasant. The northern side of Leighton Road offers the safer pedestrian route but involves crossing both Vimy Road and Leighton Road, busy roads when I was there. The footway on the southern side of Leighton Road is interrupted by numerous accesses to commercial properties.

14. The highway improvements proposed by Tesco and the County Council would not alter the distances, nor the general environment – but they would favour the walk along the northern side of Leighton Road by providing controlled crossing points of both Vimy Road and Leighton Road. Direct access to the Vimy Road junction from the south-eastern corner of the car park would allow car-borne shoppers a shorter walk to the town centre, consistent with the guidance in PPG6. It would not benefit shoppers arriving in the town centre by other means who might wish to walk to the Tesco store – though those people at least have the option of going to what appears to be a buoyant Waitrose store in the town centre itself.

15. There may well be a significant number of Tesco customers who make linked trips to the town centre. And there will be those who park at Tesco to visit the town centre. But evidence on the level of those trips is not conclusive.

16. The Tesco survey shows that 6% of the customers interviewed visited the town centre that day for non-food shopping, 6% for financial services, 3% for food shopping and 6% for other reasons – but the sum total of 21% could well include some double counting. And there is no indication of whether those visiting the town centre walked or drove. The sum total of 64% who had ever combined shopping at the store with a visit to the town centre is similarly open to question. The customer interview survey organised by Boreham shows that 7% (Friday) and 22% (Saturday) of those interviewed were also visiting the town centre. The pedestrian interview survey is of no further help. Because the interview point was outside the car park, the survey cannot express the numbers walking to the town centre as a percentage of total Tesco shoppers – the figures it gives do no more than identify the destinations of those walking away from the car park.

17. The appellant says that the 2000 household survey shows some 35% of Tesco shoppers undertaking a linked trip – very much higher than one might gauge (22% maximum) from the two customer surveys. The survey question was whether the shopper 'normally' visited the town centre as well – so the actual proportion of linked trips is likely to be significantly smaller. The Council says that the same household survey showed 21% linked trips. I do not know how two expert witnesses come to such different conclusions – but the Council's view at least tallies with the other survey results. Hillier Parker found in 1997 that 55% of Tesco customers made linked trips to the town centre for financial services, 21% for other

shopping and 15% for other services – but the evidence I have is silent on whether those trips were made normally, regularly or just occasionally.

18. All told, the evidence does nothing to dissuade me from treating the store as out-of-centre rather than edge-of-centre. Hillier Parker found that 92% of those making linked trips did so by car, which tends to support that conclusion. The household survey showed 44% of people normally doing their food and grocery shopping at Tesco, more or less the same percentage as shopped at Waitrose, Safeway and Aldi put together. That may make Tesco the anchor store for Leighton Buzzard so far as convenience shopping is concerned – because it attracts many more customers than the other food stores – but I think there is good reason not to place too much weight on that.

19. If one assumes a 22% incidence of linked shopping trips from the Tesco store to the town centre (consistent with the maxima in the Tesco and Boreham surveys) and equates that with 22% of the store's estimated turnover of £30.68m in 2005), then the Somerfield survey suggests that linked trip expenditure could amount to £0.67-£1.42m, depending on whether one sees the store as out-of-centre or edge-of-centre. The total turnover of the town centre is estimated at £47.59m in 2005 (Mr Arnold's Appendix 11 – £29.88m comparison goods expenditure from Table 14 and £17.71m convenience goods expenditure from Table 5, adding together the turnovers from Waitrose, Iceland, the market and local shops). At best, linked trip expenditure from the Tesco store amounts to about 3% of that, which I do not consider justifies the description of anchor store for the town centre. In my opinion, the Waitrose store, in the town centre, with turnover estimated at £15.18m in 2005, and with likely linked trip expenditure of about £3.21m (derived from the figures in the Somerfield study) is, in monetary terms, very much more deserving of the term.

20. It may be incorrect to apply the findings of the Somerfield study as I have done above. Firstly, the study says that the overall incidence of linked trips was 46% and it does not differentiate according to store location. I find that strange – because I am sure that town centre stores must generate a higher proportion of linked trips than out-of-centre stores. Perhaps the study accounts for that in the different rates of expenditure generated from town centre, edge-of-centre and out-of-centre stores. Secondly, the 46% linkage is the percentage of shoppers, not turnover – although there is no indication of how one might relate one to the other. Thus, one can perhaps do best by taking 46% of turnover and then, for the out-of-centre location, 10p/£ of that. That gives linked trip expenditure of about £1.41m, virtually the same as my calculation for surveyed linked trips at Somerfield's edge-of-centre rates.

21. Of course, the Tesco store may have the merit, albeit unquantifiable, of attracting those who shop in it to shop in Leighton Buzzard for other purposes as well, even if at other times.

22. Also, irrespective of just how many linked trips are presently being made, the proposed highway improvements would likely encourage more people to walk between the Tesco store and the town centre. A proposal that would bring enhancement of the existing links may be welcomed at least on that basis.

*Need*

23. Qualitative and quantitative need are not disputed in convenience terms – and can clearly only be met by extension of the existing store. The site-specific convenience need cannot, however, be widened to justify an extension to be used for the sale of comparison goods.

24. Nor do I consider that a convenience business analysis can best estimate the impact of the proposal on Leighton Buzzard town centre. Convenience businesses tend to compete with

convenience businesses and capacity is relatively easily calculated in those terms. But the point here, it seems to me, is that comparison sales would be introduced where they do not presently exist (at least lawfully) and could thus have an adverse impact on a town centre that might not otherwise be thought to be affected.

25. The comparison goods expenditure available within the study area is agreed as £143.51m in 2005. What is not agreed is the proportion of it that is spent within the area. The Council thinks 25% (£35.88m), the appellant 32.7% (£47.00m). The appellant's figure derives from household survey results that also give Homebase a turnover of £15.45m in 2005, which was agreed to be an anomaly. A more reasonable figure was thought to be in the region of £5.4m. The difference between 25% and 32.7% retention is of the same order as the difference between that and £15.45m. Also, the appellant and the Council were apparently agreed that the retention rate was about 25% before the household survey results were analysed. Thus, in the absence of further explanation or evidence regarding Homebase's turnover, I am content to assume 25% retention for the purposes of estimating need.

26. On that basis, comparison goods expenditure available to Leighton Buzzard would amount to £35.88m in 2005. Using the long term comparison goods expenditure growth rate of 4.2%, that would rise to £40.75m by 2008. Estimates of the comparison goods turnover of the Tesco store are £0.63m existing and £2.0m proposed. I am not sure how reliable these figures can be since they are based on existing and proposed comparison goods sales areas that both differ from those in the Statement of Common Ground. Also, I think it right to use the total estimate, rather than the proposed increase, since the existing turnover is in breach of condition 13 of the original planning permission. Even so, the estimated £2.00m turnover would be absorbed by something like sixteen months' growth in comparison goods expenditure, which suggests ample quantitative capacity for the estimated comparison goods turnover of the proposed extension.

27. Turning to qualitative need, I think it too easy to blur the dividing line between, on the one hand, the needs of a convenience store that is over-trading and thus struggling to provide the appropriate quality of service in its core food offer and, on the other hand, the need to expand the non-food offer. Tesco's Mr Potts writes, 'The store will remain essentially and predominantly a convenience outlet, serving the main food shopping requirements of the catchment area, and in order to assist the store to fulfil that role, the proposed extension will serve also to improve the store's ancillary durable goods facility'. The question to be answered is how that durable goods facility can assist.

28. Tesco's own survey found that 65% and 64% of respondents thought, respectively, that a larger range of non-food items and adult clothing ought to be provided. To my mind, however, a positive answer was highly likely when asked to what extent those things would 'improve your shopping experience'.

29. It is said that durable goods within the store would be more likely to attract 'one-off impulse purchases in association with a main food shop'. If that is so, there can really be no threat of customers abandoning the store in Leighton Buzzard simply because other stores elsewhere have a greater range of durable goods. Moreover, the existing over-trading in no way suggests that potential customers are already going elsewhere because of a limited durable goods offer. They may be going elsewhere because the store is crowded and does not always have the convenience items they want – but that is wholly different.

30. It is also said that 'the non-food items to be sold from the store do not allow the public to compare both quality and price with other retailers selling similar goods'. This comment

appears to relate to the comparative isolation of the out-of-centre location – in which case the opportunistic selling of durable goods is much more likely to capture trade that would otherwise have gone to town centre retailers, not to convenience stores elsewhere.

31. Accordingly, I see no qualitative need to retail durable goods. I can understand the desire to do so – if only to match the durable offer of convenience stores in other towns – but that, in my opinion, represents commercial policy, not qualitative need. Indeed, Tesco's Interim Report 2002 states that non-food sales is one of the four key elements of its strategy and that, in the first half of the year, non-food sales increased strongly. It may well be that the strategy has evolved since the Leighton Buzzard store was built – but that is not something that necessarily affects the assessment of qualitative need in the particular case.

*Sequential Analysis*

32. The Secretary of State has endorsed the class of goods approach rather than a format-driven approach to sequential assessment. The Tesco store is out-of-centre but the durable goods proposed to be sold could be sold within the town centre. It is necessary to look at what opportunities there may be for that to occur in practice.

33. There are no sites allocated for retail development in the Local Plan. The Town Centre Strategy recognises the former cattle market, to the rear of the southern frontage of High Street, as 'the last significant development opportunity in Leighton Buzzard' – but the emerging Local Plan identifies various difficulties to be resolved and suggests that the main land use should be residential. The appellant says that the site is too small for even a small supermarket. But that misses the point of the class of goods approach – it is not a site for a supermarket that is to be investigated, it is a sequentially preferable site (or sites) from which the proposed ranges of durable goods might be sold. That said, even if the cattle market site were thought able to accommodate an element of durable goods retailing, it seems to me highly unlikely to become available within a reasonable period of time.

34. The only other site drawn to my attention is in the Waterborne Centre. Planning permission was apparently granted in 1997 for a shop of some 390sqm as part of the refurbishment of the then Bossard Centre. It has not been implemented but a new application for 450sqm gross area has been submitted to the Council. I do not think it matters that the site lacks rear servicing and is in a secondary location; it seems to me that some of the goods proposed to be sold in the Tesco store – clothing or electrical goods, for example – could readily be sold from this location. Another application recently submitted to the Council involves the existing public house in Waterborne Walk; it would provide three units with 1,000sqm gross floor area (though I suspect the net sales area would be less than half of that). Again, some of what is proposed to be sold at Tesco could be readily sold here.

35. The vacancy rate in Leighton Buzzard is very low – just 6.5%. This means there is very little further scope for additional comparison retailing within the town centre as it stands. However, even if the overall potential is very limited, there are nevertheless two reasonable opportunities, amounting to at least the same floor area, to sell in Leighton Buzzard town centre the types of durable goods proposed to be sold at the Tesco store.

*Impact*

36. It is difficult to be at all precise about impact on the town centre – not least because of the substantial difference between appellant and Council on what proportion of comparison expenditure is retained within the catchment area. However, as I said above, I am content to assume 25% retention for the purposes of estimating impact.

37. The appellant's and the Council's figures are not very far apart on actual expenditure within the catchment area – £35.29m compared with £39.21m. From the information provided on sales densities, I am sure that the true figure lies somewhere between the two. Assuming 25% retention, or £35.88m available expenditure, the appellant's figures give a surplus capacity of £0.59m, the Council's a deficit of £3.33m. With £0.63m for Tesco's existing durable goods turnover already included, the £1.37m estimated turnover from the extension would lead to a deficit somewhere between £0.78m and £4.70m in 2005. The latter figure would reduce to £1.18m by 2008.

38. The appellant makes three estimates. Firstly, impact on town centre shops would be £0.53m, or just 1.8%. Secondly, comparison goods expenditure from the catchment area is expected to increase by £6.0m annually. Given my assumption of 25% retention, that would mean roughly a £1.5m annual increase in available expenditure. The impact would thus be absorbed in three or four months. Thirdly, the extension is expected to bring a reduction in comparison goods expenditure outflow of £0.82m. I have to doubt this last figure. In theory, if comparison purchases at this or any other Tesco store are likely to be 'one-off impulse purchases', then providing additional floorspace at the Leighton Buzzard store should not claw trade back from elsewhere – because, by that very definition, customers cannot be going to other stores expressly for their durable goods offer.

39. The Council estimates the comparison goods impact on the town centre shops at £1.13m, or 4%. It also sees an indirect impact because convenience trade diverted from Waitrose to Tesco would mean a reduction in linked trip spending in the town centre. I think this is theoretically correct, when one is looking purely at comparison goods impact, but the sums involved would hardly be substantial. The Council estimates a £1.10m convenience impact on Waitrose, which, using the Somerfield study, leads to a net loss of £0.18m in linked trip expenditure. Adding that in would give an overall comparison impact of about 4.6%, which does not seem particularly high.

*Conclusion on the Main Issue*

40. My conclusions on the various aspects of the main issue are that the existing Tesco store is in an out-of-centre location, that the generation of linked trips is limited (probably no more than 22% of customers), that there appears to be quantitative capacity for comparison goods expenditure (based primarily on the relationship between what is proposed and the annual expenditure growth rate), that there is no qualitative need, that the sequentially preferable options are very limited but at least include two town centre opportunities of amounting to the same area as is proposed for comparison sales and that the impact of the proposed extension in comparison terms would be a modest 4.6% at most.

41. The appellant is correct to say that turnover in town centre shops would quickly return to, and rise above, pre-extension levels. The Council says that this misses the point – that policy looks, first and foremost, to locate new retail floorspace in town centres. I agree with the Council. The first objective of PPG6 is 'to sustain and enhance the vitality and viability of town centres'. The sequential approach 'means that first preference should be for town centre sites'. Mr Caborn's statement, in my understanding, says that showing capacity is not necessarily sufficient to demonstrate need (though it might be in some circumstances). Here, there is that capacity – but in the context of an out-of-centre store limited by condition to selling convenience goods in order not to undermine the town centre. I have found no qualitative need that could justify, itself or in tandem with quantitative need, new out-of-centre comparison goods sales space that would go against that original objective, which is

on all fours with the guidance in PPG6. Government policy takes a 'class of goods' approach to sequential analysis. There is no reason in principle why the comparison goods proposed to be sold at the Tesco store could not be sold in the town centre. It does not need to be Tesco that sells them. And there are two possible town centre sites, which the evidence suggests are both suitable and available, from which those goods could be sold.

42. Accordingly, the proposal fails the test of national retail policy before the trading impact on the town centre comes to be assessed. That the impact would be modest cannot, in my opinion, outweigh the fact that the proposal runs directly contrary to firmly established policy. Quite simply, comparison expenditure potential would go to an out-of-centre location at the expense of the town centre. I consider it insufficient to argue that anticipated expenditure growth would subsequently disguise that loss. I realise that there is scope for argument as to whether some of the durable goods that would be sold (and are presently being sold) should properly be considered comparison goods. But some clearly are (clothing, electrical goods and some household goods for instance). To sell them at an out-of-centre location would fail to sustain or enhance the vitality and viability of Leighton Buzzard town centre – irrespective of whether or not it is a healthy town centre.

*Other Matters*

43. Two specific decisions on store extensions were referred to in evidence – the Secretary of State's decision on an application in Oldham and an Inspector's decision on an application in Aldershot. Tesco has challenged the Oldham decision in the High Court, which means it would be inappropriate, irrespective of any similarity in the circumstances, to give it weight in coming to my conclusions in this case. In the Aldershot case, the circumstances appear significantly different – not least because the original planning permission did not restrict the range or type of goods that could be sold from the store and it was thus an important consideration that the net sales area for comparison goods could be restricted.

44. It was said that the proposed development would bring several benefits – serving properly the catchment area population, securing sustainable patterns of shopping, improvements to the local highway network, improved accessibility by public transport, a reduction in car parking spaces, a travel plan and job creation. Some would flow from an extension for purely convenience sales, some might be secured by such an extension and jobs would be created whether durable goods sales were in the town centre or at an extended store. None of these benefits is so crucial or unique as to outweigh my conclusion on the main issue.

**Conclusion**

45. For the reasons given above and having regard to all other matters raised, I conclude that the appeal should be dismissed.

**Formal Decision**

46. In exercise of the powers transferred to me, I dismiss the appeal.

**Information**

47. A separate note is attached setting out the circumstances in which the validity of this decision may be challenged by making an application to the High Court.

John L Gray Inspector

## APPEARANCES

### FOR THE LOCAL PLANNING AUTHORITY

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|---|---|
| Mr M Humphries of Counsel | Instructed by the Solicitor to South Bedfordshire District Council. |
| *He called* | |
| Mr C L Tookey BA(Hons) BTP MRTPI | Principal Planner, Hepher Dixon, Town Planning Consultants, Milton Keynes. |

### *FOR THE APPELLANT*

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| Mr K Lindblom QC | Instructed by Berwin Leighton Paisner, Solicitors, 20-22 Tudor Street, London, EC4Y 0AY. |
| He called | |
| Mr G C Corrance BSc DMS CEng MICE MIHT | Associate Director, Boreham Consulting Engineers, Brentwood, Essex. |
| Mr S C T Arnold MA(Cantab) MA(TP) MRTPI MRICS | Managing Partner, Development Planning Partnership, Bedford. |

### INTERESTED PERSONS

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|---|---|
| Ms V Harvey | South Bedfordshire Friends of the Earth, 41 Corbet Ride, Leighton Buzzard, Bedfordshire, LU7 2SJ. |
| Mrs C Parnell | 6 Lincombe Slade, Linslade, Bedfordshire, LU7 2SG. |

## DOCUMENTS

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| Document | 1 | Lists of persons present at the inquiry. |
| Document | 2 | Press notice, notification of inquiry and distribution list. |
| Document | 3 | Eight representations from third parties received before/during the inquiry. |
| Document | 4 | The application plans – drawings nos. 319099/05; 2825.99.02/C, 04/A, 11, 12, 13/B, 14/B and 15/B; 2825.00.50/B and 51/B; 2591/02 (two copies – existing and proposed), and F/EXT/782/SK07/A. |
| Document | 5 | Statement of Common Ground. |
| Document | 6 | Appendices to Mr Tookey's evidence (entitled as those of Mr Potts). |
| Document | 7 | Appendices to Mr Corrance's evidence. |
| Document | 8 | Appendices to Mr Arnold's evidence. |
| Document | 9 | S106 planning obligation. |
| Document | 10 | Addendum to Statement of Common Ground. |
| Document | 11 | Extract from Tesco plc Interim Report 2002. |
| Document | 12 | Suggested conditions should the appeal be allowed. |
| Document | 13 | Leighton Buzzard Town Centre Strategy, November 1997. |
| Document | 14 | Supporting Planning Statement for a proposed extension to the Asda store at Lammascote Road, Stafford. |
| Document | 15 | Tables 4.10 and 5A from Volume 2 of the Leighton Buzzard Retail Study 1997 (Volume 1 is at Document 8, Appendix 7). |
| Document | 16 | Estimate of Leighton Buzzard's market share of comparison goods expenditure. |
| Document | 17 | Extract from Proposed Modifications, January 2003, to the emerging South Bedfordshire Local Plan. |
| Document | 18 | Petition submitted by South Bedfordshire Friends of the Earth. |
| Document | 19 | Extract from Consumer Retail Expenditure Estimates for Small Areas (1995). |
| Document | 20 | Papers relating to the High Court challenge to the Secretary of State's decision on an application to extend the existing Tesco store in Oldham. |
| Document | 21 | Sample questionnaire for the survey at Document 7, Appendix 20. |
| Document | 22 | R v Hambleton District Council *ex parte* Somerfield Stores Ltd, CO/824/97. |
| Document | 23 | Chichester District Council v the Secretary of State for the Environment and Chartwell Land Properties Limited, CO/606/98. |
| Document | 24 | Plan SA1 – Isochrone, Shopping Provision and Survey Zone Plan. |
| Document | 25 | Plan SA2 – Land Use and Planning Context Plan. |