



Report to the Secretary of State for Transport

by Martin Whitehead LLB BSc(Hons) CEng MICE

an Inspector appointed by the Secretary of State for Transport

Date: 7 November 2012

HIGHWAYS ACT 1980 ACQUISITION OF LAND ACT 1981

LUTON BOROUGH COUNCIL (STATION HOUSE, MIDLAND ROAD) COMPULSORY PURCHASE ORDER 2011

Date of Inquiry: 25 October 2012

Ref: DN5042/60/1/19

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CASE DETAILS

- This Order was made on 14 July 2011 under sections 239, 240 & 250 of the Highways Act 1980 and the Acquisition of Land Act 1981, and is known as the Luton Borough Council (Station House, Midland Road) Compulsory Purchase Order 2011.
 - The Order was published on 15, 17 & 24 July 2011, and there was one statutory objection outstanding to it at the commencement of the local Inquiry.
 - The Order, if confirmed by the Secretary of State, would authorise Luton Borough Council to purchase compulsorily the land and the new rights over land described therein for the purposes of:
 - (a) the improvement of the highway around Station House and the access route from High Town to Luton Station; and
 - (b) use by the highway authority in connection with the construction and improvement of the highway and the provision of a new means of access to Station House.
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Summary of Recommendation: I recommend that the Order be confirmed subject to the modification proposed

1 PREAMBLE

- 1.1 There were 2 statutory objections to the Order, by GPS Estates Ltd and Network Rail respectively, but the latter was withdrawn by letter dated 6 February 2012¹. The former, and a non-statutory objection by Mrs Iris Thorpe, were outstanding at the opening of the Inquiry.
- 1.2 A previous Inquiry sat for 1 day, on 14 March 2012. The Inspector at that Inquiry heard legal submissions regarding a breach of the 'without prejudice' rule in evidence for the statutory objector. Following these submissions, the Inspector ruled that he would close the Inquiry without proceeding further, with a view to a new Inquiry being held at the discretion of the Secretary of State by a different Inspector. I was appointed by the Secretary of State to conduct a further Inquiry in accordance with section 13(2) of the Acquisition of Land Act 1981 and paragraph 7 of Schedule 1 of the Highways Act 1980. I did not take part in the previous Inquiry and do not know the nature of the certain material to which reference was made. As such, my position is not prejudiced with regard to my conclusions and recommendation in this report.
- 1.3 I held an Inquiry at Luton Town Hall, George Street, Luton on 25 October 2012 to hear representations and objections concerning the submission made by Luton Borough Council (LBC), as the 'Order Making Authority' for confirmation of the above-mentioned Order.

¹ Document I 04

- 1.4 I carried out an unaccompanied site inspection of the land and surrounding area on 25 October 2012 following the close of the Inquiry. I also completed an unaccompanied site visit of the area on 24 October, prior to opening the Inquiry.
- 1.5 By the close of the Inquiry, no notification had been received from either of the 2 objectors that they had withdrawn their objections. These objectors did not appear at the Inquiry but Mr Oakley-Hill did appear as an objector to the Order. Mr King appeared in support of the Order.
- 1.6 The Order land is required to implement a scheme for a replacement footbridge and footpath from Midland Road to the railway station, which forms part of wider improvement proposals in Luton Town Centre, the Station Quarter, Luton Station and High Town.
- 1.7 The main grounds for objection to the Order were that the existing route is sufficient for pedestrian access without the need to acquire the land; the relocation of the access to Station House and car parking on Midland Road would lead to a reduction in highway and pedestrian safety; there would be an increase in a risk to security and vandalism at Station House; mature trees would be lost with no provision for environmental benefits to mitigate their loss; and Station House would be adversely affected.
- 1.8 The Order Making Authority confirmed at the Inquiry that it had complied with all necessary statutory formalities. It also provided a certificate as to Notice of Public Inquiry and copies of the Notices of the Inquiry².
- 1.9 This report contains a brief description of the site and surroundings, the gist of the cases presented together with my conclusions and recommendation. Lists of Inquiry documents are attached, including proofs of evidence.

2 DESCRIPTION OF THE SITE AND SURROUNDINGS

- 2.1 The Order land comprises land to the east and north of Station House, which is a commercial property. The land is enclosed by a close boarded timber fence and gates. It is mainly paved but includes some trees. It is located in Luton High Town, adjacent to Midland Road and a pedestrian route to the railway station and town centre via a new footbridge. There is a pedestrian zebra crossing on Midland Road immediately to the east of the land and opposite the footpath to the bridge. It is located near to a gated vehicular access at the north east corner of the land. Three mature sycamore trees are planted in the public footway along Midland Road adjacent to the land.

3 THE CASE FOR THE ORDER MAKING AUTHORITY (LUTON BOROUGH COUNCIL)³

- 3.1 The Luton, Dunstable and Houghton Regis Local Transport Plan 2006-11⁴ contains policies to make improvements to the environment within Luton town centre. The proposed alterations to the footways around Station House would improve the public realm in the immediate vicinity of the property and enhance the pedestrian route from High Town to the station,

² Document I 05

³ Documents A 01, A 02 and A 03

⁴ Document D 05

- and on to the town centre. The works would also improve the overall town centre environment.
- 3.2 The Luton Town Centre Development Framework, December 2004,⁵ highlighted the poor pedestrian links between High Town and the town centre. The report suggested replacing the existing bridge from High Town with a wider and more welcoming structure and included forecourt improvements. The emerging proposals for new housing in the High Town area would increase pedestrian movements from High Town to the Station and to the Town Centre and would therefore make the improvements to this pedestrian route more important.
- 3.3 A Supplementary Planning Document for the High Town area was adopted by LBC in November 2007. This identified the High Town Gateway, at the junction of the footbridge, Midland Road and High Town Road, as the key node and as Key Project 1 in order to help enable the regeneration in the area⁶.
- 3.4 The Luton Rights of Way Improvement Plan (LRWIP)⁷ was adopted by LBC's Executive on 14 July 2008, and includes an action to improve routes to district/town centres and other key travel attractors for pedestrians, and in particular mobility impaired people. The action plan in the LRWIP specifically identifies the route between High Town/Luton station and the town centre for improvement in 2008/09.
- 3.5 The first stage of the scheme for the replacement footbridge and footpath from Midland Road to the railway station was the replacement of the footbridge, which opened in October 2010. It forms part of the wider improvement proposals in Luton Town centre, the Station Quarter area at Luton Town railway station and High Town. The Order land would provide a public space or square as a gateway to the station from the High Town area. The proposals are shown on a plan and a photographic image in a report on Luton Station Square by Gillespies⁸.
- 3.6 Three trees within the Order land would need to be felled for the improvements, which would each be replaced by 2 trees in the locality⁹. Station House is a commercial property, which is in a conservation area. The building is on the Local List of buildings of architectural or historic interest. Proposed improvements to Station House boundary would be complemented by works to improve the appearance of the entrance to the conservation area. This would enhance the setting of the building and the pedestrian realm at the junction of Midland Road and High Town Road and improve the sight lines between High Town Road and the footbridge¹⁰.
- 3.7 The entrance to the footbridge is used daily by about 3000 people walking to and from the station and town centre and is one of the busiest

⁵ Document D 06

⁶ Document D 07 paras 4.1 B, 4.2 A and Appendix A page 22

⁷ Document D 08

⁸ Documents D 24 and A 04 Appendix JA2

⁹ Document A 02 para 2.14

¹⁰ Document A 02 para 2.17 and Document A 08

- pedestrian routes in Luton¹¹. The use of this route is likely to increase due to future regeneration of the High Town area¹². The proposed relocation of the vehicle entrance to Station House would remove the pedestrian/vehicle conflict away from this main pedestrian route. Two pedestrian accidents have been recorded in 2012 on Midland Road near to the existing entrance¹³. The widening of the footway along Midland Road would improve sight lines from the proposed new vehicular access to Station House¹⁴.
- 3.8 There is no proposal to lay out new parking spaces on the Order land or on Midland Road. A proposed modification to the Schedule would make it clear that the rights are for existing car parking and not to lay out additional new spaces¹⁵.
- 3.9 The pedestrian desire lines crossing Midland Road are significantly wider than the existing pedestrian crossing, spreading westwards in front of Station House. There is insufficient footway width for people to wait while allowing comfortable access for other footway users. Widening the footway along the northern boundary of Station House would help alleviate this conflict and prevent pedestrians having to step into the road at busy times. It would also create a safe passage for wheelchair and pushchair users at all times of day.
- 3.10 Without the acquisition of the Order land the overall scheme would not be able to be fully implemented within a reasonable time period and at a reasonable cost¹⁶. The proposal would promote public transport and pedestrian facilities by providing an improved route to the town centre, station, bus stops, High Town and the future proposed transportation interchange, in particular for mobility impaired people, people with push chairs and those with heavy luggage¹⁷. This is in line with Manual for Streets¹⁸ and the objectives of the National Planning Policy Framework¹⁹.
- 3.11 The Compulsory Purchase Orders for the construction of a new road between Old Bedford Road and Hitchen Road/Church Street were confirmed in April 2012 as part of the Luton Town Centre Transport Scheme. This requires the closure of both ends of Midland Road with alternative access/egrees provided and would significantly reduce traffic flow along Midland Road²⁰.
- 3.12 Planning permission Ref No 09/00833/COU was granted for the proposed scheme on 1 October 2009²¹. Consent Ref No. 09/00736/TPOS was

¹¹ Document A 02 para 2.15 and oral evidence given by Philip Cunningham at the Inquiry

¹² Philip Cunningham oral evidence given at the Inquiry

¹³ Document A 10

¹⁴ Document A 02 para 4.2 (2)

¹⁵ Document A 06 and oral evidence given at the Inquiry

¹⁶ Document A 02 para 2.18

¹⁷ Document A 02 para 2.23

¹⁸ Document D 22

¹⁹ Document A 05

²⁰ Document A 02 para 2.21 and updated oral evidence given by Philip Cunningham at the Inquiry

²¹ Document D 11

- granted on 1 October 2009²² to fell three trees. A tree survey and report on tree amenity value and condition supported this application. The report identifies the 3 sycamore trees to be felled as being Category C, which are of no particular merit, and they are in poor condition²³. Although both the planning permission and consent are no longer extant, there are no obvious reasons why they would be withheld in the future²⁴. Landscaping would have been included under planning conditions attached to the planning permission.
- 3.13 On 16 February 2009, LBC's Executive resolved to acquire the Order land²⁵ for highway purposes to facilitate implementation of the Improvement scheme. It also approved the funding for the scheme. A further report was made to LBC's Executive on 26 October 2009²⁶ which clarified the proposed land acquisition.
- 3.14 Growth Area Funding (GAF 3)²⁷ has been approved and is currently available for improvements to the pedestrian link between the station and High Town. The key part of this work is a new wider footbridge and at the area where the footbridge/footpath joins Midland Road. As such GAF3 funding is available for this proposed project. This funding is 'ring-fenced' and so would not affect LBC spending²⁸.
- 3.15 LBC's Supplementary Planning Document on Planning Obligations²⁹ adopted in September 2007 includes a facility for section 106 contributions from relevant developments towards transport improvements within the Borough as identified in the Local Transport Plan. Therefore, it may be possible for section 106 contributions from developments to carry out wider improvements in the High Town area in order to enhance and complement the proposed scheme.
- 3.16 A previous Order was withdrawn as it was not dated in the year that it was made and its title was not accurately stated in statutory publicity. There were errors in the areas of land in the Schedule to the withdrawn Order which have been corrected in the current Order. The areas of land to be acquired are the same³⁰. They represent the optimum land take, having considered alternatives³¹. Station House would be retained. The tenant would not need to relocate and the proposed scheme would have no material impact on its business. Vandalism should be reduced and security increased at Station House due to increased pedestrian activity³².

²² Document D 12

²³ Document A 09 Table of Tree Assessment and Root protection Zone

²⁴ Wendy Rousell oral evidence given at the Inquiry

²⁵ Document D 03

²⁶ Document D 04

²⁷ Document D 03 Agenda Item 18 (iii)

²⁸ Oral evidence given by LBC witnesses at the Inquiry

²⁹ Document D 23

³⁰ Document A 02 para 4.2 (5).

³¹ Document A 02 paras 3.1 to 3.3

³² Philip Cunningham oral evidence given at the Inquiry

3.17 The above gives a compelling case for the acquisition of the Order land in the public interest. There is no question of an interference with the human rights of those with an interest in the land. The statutory objector has not given evidence at the Inquiry to substantiate its objections. LBC has a clear idea of how the land would be used and has all the necessary resources to carry out the works in a very short timescale. There are no impediments to the implementation of the scheme³³.

4 THE CASE FOR THE SUPPORTER (Richard King)³⁴

4.1 Richard King indicated that he was pleased that the scheme would not demolish Station House, which is an historic building, and would enhance its setting and improve safety. He suggested that the route from High Town to the town centre is of great importance and strongly supported the scheme and Order.

5 THE CASE FOR THE OBJECTORS

David Oakley-Hill³⁵

5.1 Although he stated that he is the elected Chair of Luton Assembly Environment & Economy Committee and Member of a number of Forums, Committees and Organisations, David Oakley-Hill accepted at the Inquiry that he was not officially representing the views of any of these bodies. He also indicated that he had withdrawn his objection but wished to make the following representations to be taken as material considerations.

5.2 There is no need to widen the dog-leg at Midland Road other than for safety reasons. The present setting of Station House is acceptable and shows off the building. It has worked well for over 100 years with heavy pedestrian traffic. The footbridge has been replaced and is not a 'Living Bridge' as proposed. The proposed land take exceeds that required for public benefit. Additional width is not required along Midland Road as few people with disabilities use that footway. The cost of the scheme would impact on LBC's funding for essential services.

5.3 It is important not to lose any more mature trees. The proposed loss of 3 trees would harm the environment, as supported by the i-Tree survey. In particular, the tree at the east end of Station House which is shown to be felled is healthy and should be retained.

GPS Estates Ltd (Statutory Objector)³⁶

5.4 GPS Estates Ltd did not appear at the Inquiry. The following are given in a letter, dated 16 August 2011, from Kirkby & Diamond as the reasons for objection to the Order.

5.5 The existing route is sufficient for pedestrian access and hence no justification has been submitted for the widening of the route. If wider

³³ Oral evidence given at the Inquiry

³⁴ Richard King oral evidence given at the Inquiry

³⁵ Document O 02 and oral evidence given at the Inquiry

³⁶ Document D 25

rights are required to facilitate the replacement of the footbridge, these could be acquired temporarily within the area of land necessary for the works. No evidence has been submitted as to why the widening of the pedestrian highway is necessary.

- 5.6 The proposed marking out of car parking spaces on Midland Road would not improve the highway at a busy local junction and the relocation of the entrance would considerably reduce the safety of drivers entering and exiting due to reduced visibility splays. No justification for the taking of land to provide this parking has been included in the Statement of Reasons. The loss of land would unreasonably and unnecessarily restrict the ability of the occupiers and tenants of Station House to park at what is already a congested site.
- 5.7 It is debatable whether the proposed new boundary would be superior. The scheme would increase security risks and the threat of vandalism at Station House.
- 5.8 The current Order seeks to acquire a larger area of land than previously proposed in an Order that was withdrawn prior to confirmation.
- 5.9 The land to be acquired under the Order includes areas planted with mature trees, some of which are proposed to be felled. The Order includes no provision for environmental benefits in mitigation of the loss of these environmental features.

Mrs Iris Thorpe (Non-statutory Objector)³⁷

- 5.10 Mrs Iris Thorpe did not appear at the Inquiry. She objected to the Order for the following reasons.
- 5.11 Station House building is an historic part of Luton and should be retained. The land to be acquired is excessive and is unnecessary for the proposed works.

³⁷ Document O 01

6 CONCLUSIONS

- 6.1 Bearing in mind the submissions and representations I have reported, I have reached the following conclusions, reference being given in square brackets [] to earlier paragraphs where appropriate.
- 6.2 There are a number of considerations to be addressed in reaching my recommendations³⁸, namely there should be:
- A compelling case for acquisition in the public interest, and
 - evidence that this justifies interfering with the human rights of those with an interest in the land, and
 - evidence that the acquiring authority has a clear idea of how the land is to be used, and
 - evidence that the acquiring authority can show that all necessary resources to carry out its plans are likely to be available in a reasonable time scale, and
 - evidence that the scheme is unlikely to be blocked by any impediment to implementation.
- 6.3 There is evident need for the scheme that would improve and widen the footpath link between High Town Road and the new footbridge. There is compelling evidence that the scheme would meet its objectives in that it would result in improvements to pedestrian safety, the environment and public access to Luton town centre, the station and public transport. The delivery of these objectives would amount to considerable public benefit. **[3.5 to 3.11 and 3.17]**
- 6.4 The scheme forms part of the High Town Gateway works that have been identified as a high priority in the development plan and other planning documents. **[3.1, 3.2, 3.3, 3.4]** It would also meet government objectives given in the Manual for Streets and National Planning Policy Framework with regard to giving priority to pedestrian movements and access to public transport facilities, and minimising conflicts between traffic and pedestrians. **[3.10]**
- 6.5 I am satisfied that the area of land that would be acquired would be insufficient to cause any significant disruption or inconvenience to those using Station House. **[3.16, 5.11]** As such, it would cause minimal interference with the human rights of those with an interest in the land. **[3.17]** LBC has provided adequate details of proposals showing what it intends to do with the land and that the area of land that would be taken would be the minimum that would be required to carry out these proposals. **[3.5]**
- 6.6 Funding has been approved for the scheme as part of the overall footbridge and footpath works in the area, and I have been given no reason to doubt that it would be made available to carry out the works within a reasonable time scale. This funding has been ring-fenced and so would not affect other LBC services. **[3.14, 3.15, 5.2]**

³⁸ Document I 03- Inspectors Note given to the parties at the Inquiry

- 6.7 With regard to the objections, the remaining statutory objector did not appear at the Inquiry and has not expanded upon its original objections to the Order. I am satisfied that these objections, including those regarding discrepancies in land take areas between the current Order and the previous Order, have been adequately addressed by LBC. **[3.16, 5.8]**
- 6.8 The existing footway between Station House and Midland Road is too narrow for wheelchairs and pushchairs to safely use, due to the mature trees that would be retained. **[2.1]** The numbers of pedestrians that have been shown by the survey to use the route between High Town Road and the replacement bridge justify a need for a wider access than is presently available, particularly given the width of the bridge. The accident record supports this need in that it indicates that pedestrians have been involved in recent collisions. **[3.5, 3.7, 3.9, 5.2, 5.5]**
- 6.9 The proposal would not result in additional car parking on Midland Road, which would be clarified by the proposed modification to the Order Schedule. **[3.8, 5.6]** Given the location of the existing access and resulting conflict between vehicles using it and pedestrians accessing the footbridge and station, the proposed relocation of the access should improve safety. **[3.7]** The proposed new boundary treatment would be an improvement to the appearance of the area and Station House and would be more secure than the existing, which is in poor condition. **[2.1, 3.6, 3.7]** Consequently, and as a result of the significant pedestrian footfall past the property, vandalism should be reduced. **[3.16, 5.7]**
- 6.10 In terms of the loss of trees, the most significant trees in that area would be retained within the adjacent footway. The report on tree amenity value and condition has identified the 3 sycamore trees that would be felled as being of no particular merit and with some decay. No other expert evidence has been provided to indicate otherwise. Additional replacement trees would be provided within the locality and landscaping had been conditioned as part of the planning permission. As such, I am satisfied that the loss of these trees would carry limited weight in comparison with the resulting benefits from improvements to the appearance of the area and to pedestrian safety and access. **[2.1, 3.12, 5.3, 5.9]**
- 6.11 Based on the above, I find that the objections to the Compulsory Purchase Order have been adequately addressed. Consequently, I conclude that little weight may be assigned to these objections in the balance against public benefit.
- 6.12 There is no evidence of any proposal to purchase land or rights other than those necessary to implement the scheme, and there have been no assertions to the contrary. I am therefore satisfied that the Order addresses no more land than is necessary, and the acquiring authority has a clear idea of how it intends to use the land. **[3.5]** Budgetary provision has been approved and I am satisfied that, if the Order is confirmed, work would start soon after. **[3.14, 3.15, 3.17]** The scheme is unlikely to be blocked by any impediment to implementation. Whilst the planning permission and consent to fell trees are no longer extant, I have been given no valid reasons why planning permission and consent would be withheld. **[3.12, 3.17]**
- 6.19 I am satisfied that there is a strong case for the scheme to be implemented to promote and improve safety for pedestrians, improve the environment

and increase public access, including by people with disabilities, to services and public transport. For these reasons, and having regard to ODPM Circular 06/2004, I find that there is a compelling case in the public interest for the land's compulsory purchase, which justifies interfering with the human rights of those with an interest in the land. Loss of any interest could be met by compensation. Therefore, I conclude that the Compulsory Purchase Order should be confirmed with the modifications set out in Document A 06.

7 RECOMMENDATION

- 7.1 I recommend that the Luton Borough Council (Station House, Midland Road) Compulsory Purchase Order 2011 be modified to amend the words in the Schedule Plot 3, Column 2, third paragraph to read: *'The right to enter the land to use the land to construct landscaping and laying out of the access to existing car parking spaces'*, and that the Order so modified be confirmed.

M J Whitehead

INSPECTOR

APPENDIX A**APPEARANCES**

FOR THE ORDER MAKING AUTHORITY (LUTON BOROUGH COUNCIL)

David Lintott	Of Counsel, instructed by the Solicitor to Luton Borough Council
He called	
Philip Cunningham BSc(Hons) BA MSc MBA FEng MICE CEng	Managing Director, Cunningham Consultancy Limited
Wendy Rousell BA DipTP MRTPI	Airport Planning Officer, Luton Borough Council

SUPPORTER

Richard King	Local resident
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OBJECTOR

David Oakley-Hill	Local resident
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APPENDIX B**DOCUMENTS**

	Inquiry Documents
I 01	Inspector's Dossier
I 02	Attendance List
I 03	Inspector's Note of Statutory Tests
I 04	Copy of Letter of notification from Network Rail, dated 6 February 2012, that it withdraws its objection to the Order
I 05	Certificate as to Notice of Public Inquiry and copies of Notices
	Order Making Authority (Luton Borough Council) Documents
A 01	Statement of Case of Luton Borough Council
A 02	Proof of Evidence of Philip Paul Cunningham
A 03	Proof of Evidence of Wendy Rousell
A 04	Joint Appendices to Proofs of Evidence of Witnesses for Luton Borough Council
A 05	National Planning Policy Framework Statement of Wendy Rousell
A 06	Luton Borough Council's proposed amended form of words for CPO Schedule Plot 3, Column 2, third paragraph
A 07	Aerial photograph showing Luton Town Centre Transport Scheme General Arrangement
A 08	Plan of sight lines to and from the footpath leading to the footbridge
A 09	Report on tree amenity value and condition by John Cromar's Arboricultural Company Limited
A 10	Plans and Accident Reports
	Objectors Documents
O 01	Letter, dated 28 September 2012, from Mrs Iris Thorpe
O 02	Objection, attachments and e-mails of David Oakley-Hill

	Deposit Documents
D 01	Copy of the Luton Borough Council (Station House, Midland Road) Compulsory Purchase Order 2011 and Map
D 02	Local List of Buildings of Architectural and Historical Interest
D 03	Copy of Luton Borough Council's Executive meeting minutes of 16 February 2009, including its resolution to acquire the Order Land
D 04	Copy of Luton Borough Council's Executive meeting minutes of 26 October 2009, including its resolution to acquire the Order Land
D 05	Luton, Dunstable & Houghton Regis Local Transport Plan 2006-2011
D 06	Luton Town Centre Development Framework, December 2004
D 07	Supplementary Planning Document: Luton High Town, adopted November 2007
D 08	Luton Rights of Way Improvement Plan
D 09	GPS Estates Ltd applications for conservation area consent and planning permission, decision notices and block plan
D 10	Notices, advertisements and letters publicising the Order
D 11	Planning permission Ref No 09/00833/COU for the proposed scheme, dated 1 October 2009
D 12	Consent Ref No 09/00736/TPOS to fell three trees, dated 1 October 2009
D 13	ODPM Circular 06/2004: Compulsory Purchase and The Crichel Down Rules
D 14	The Revision to the Regional Spatial Strategy for the East of England, May 2008
D 15	Not used
D 16	Not used
D 17	Luton Local Plan 2001-2011

D 18	Planning Policy Statement 4: Planning for Sustainable Economic Growth
D 19	Planning Policy Statement 5: Planning for the Historic Environment
D 20	Planning Policy Guidance 13: Transport
D 21	Copy of Department for Transport: A New Deal for Transport: Better for Everyone- White Paper
D 22	Manual for Streets
D 23	Luton Borough Council Supplementary Planning Document: Planning Obligations
D 24	Gillespies' Document: Proposed Public Realm Improvements High Town
D 25	Copy of letter of objection by Kirkby & Diamond for GPS Estates Ltd
D 26	Copy of Legal Agreement between Luton Borough Council and Westmill Limited and Planning Permission, dated 1985
D 27	Copy of Legal Agreement between Luton Borough Council and Westmill Limited and Planning Permission, dated 1992
D 28	Copy of the withdrawn Luton Borough Council (Station House, Midland Road) Compulsory Purchase Order 2009
D 29	Copy of the letter of objection by Network Rail to the Order, dated 26 July 2011