



## ENGLISH HERITAGE

### SOUTH WEST REGION

Mr Jeremy Content  
Planning & Regeneration  
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Your ref: PA10/08142  
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8 February 2011

Dear Mr Content

Having read the planning reports for the Hayle supermarket applications, I was more than a little surprised, and greatly concerned; particularly with regards to the report on the South Quay, the proposals that have the capacity to cause the greatest harm to the Cornish and West Devon Mining Landscape World Heritage Site (WHS).

The report fails to mention the concerns UNESCO expressed regarding possible developments in Hayle at the time of inscription, reiterated in its subsequent *Statement of Outstanding Universal Value* for the WHS (2010) which states:

"The ability of features within the property to continue to express its Outstanding Universal Value may be reduced, however, if developments were to be permitted without sufficient regard to their historic character as constituent parts of the Site. The spatial arrangements of areas such as Hayle Harbour.... are of particular concern and these may be vulnerable unless planning policies and guidance are rigorously and consistently applied."

Comments from the Council's HES, relating to the potential threat to WHS status, are also pertinent (omitted from the report):

"UNESCO and its advisers, ICOMOS, will require the planning authority to demonstrate that both of these issues [relating to assessment of, and appropriate response to OUV] have been covered. If they cannot, it is possible that the Cornish Mining WHS would be referred to the World Heritage Committee for consideration of inclusion on the "World Heritage at Risk" register.....[and]....could ultimately result in loss of World Heritage status for the whole of the Site (not just Hayle)."

Given English Heritage's objection; ICOMOS UK's objection; CABE's (unreported) inability to support the proposals; the (unreported) "fundamental issues of concern" raised by Cornwall Council's own HES; UNESCO's (unreported) stated concerns; the planning report's statement that "the current proposals fail to deliver the objectives of PPS5 and will harm the significance of the WHS.... the Hayle Conservation Area and.... the character and appearance of the listed buildings."; we do not believe it possible to address the fundamental changes necessary within the form of the current applications, and, therefore, do not consider deferral of these applications appropriate.

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As noted, the recommendations from Cornwall Council's HES (dated 21 January 2011) are not included in the report:

"We believe that the **fundamental issues of concern** relating to the impact of the proposed supermarket development, outlined above, can only be addressed by reducing the size of the supermarket building itself and by a radical re-think of the layout of the car-park. This position has been maintained by us throughout the lengthy negotiation process, as acknowledged in the Planning Services' negotiations with ING.

As outlined above (section 3.1.1) the Council as LPA **must** be able to demonstrate that the World Heritage OUV has been appropriately considered in determining the application.

There are a **number of other issues which need to be resolved** and will help to minimise negative impact on the character of the Quay, and in some cases (particular in regards to the exposure, treatment and repair of the quays themselves) are a pre-requisite of any permission. Again these recommendations have been suggested throughout the negotiation process."

CABE's comments are also not reported in the *Summary of Consultations* section: they raise significant concerns and state: "In light of the shortcomings in the design and site planning noted above we are unable to support the planning application in its current form."

There are other areas of the report which are of concern. For example, paragraph 11.97 states "The proposed supermarket is not considered to overly harm the legibility of the harbour." In our view, this conflicts with the general tenor of CABE, ICOMOS UK, the HES and EH's advice.

WHSs are designated heritage assets of the highest significance, and Hayle has been identified by UNESCO as being particularly sensitive to change. Given its significance and the weight of concerns expressed by all four heritage and design bodies (CABE, ICOMOS UK, EH and the HES) English Heritage considers it inappropriate to defer such a major application and delegate approval subject to (unspecified, but significant) variations in layout and design.

I re-attach the comments of English Heritage, CABE, the HES and ICOMOS UK on the South Quay proposals. In our view a combined approach to both South Quay and the Jewson's site could deliver better proposals for the town of Hayle. These sites could be regenerated in manner which recognises and celebrates the unique historic character of Hayle, acting as a true focus for sustainable, long-term regeneration.

I would be grateful if you can confirm that the attached responses (and this letter) will be provided **in full** to members of Committee, in sufficient time prior to the meeting. I am sure you would agree that it is essential that any decision made is fully informed by a complete understanding of the issues, and I am equally sure that your members would not wish to jeopardise inscription of the Cornish and West Devon Mining Landscape World Heritage Site, which we all value so highly.

Yours sincerely

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