

# **ACTORIS LTD**

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**JEWSON SITE, CARNSEW QUAY, HAYLE**

**FULL PLANNING APPLICATION FOR A NEW FOODSTORE AND  
ASSOCIATED WORKS**

**PPS4 IMPACT STATEMENT**

FULL APPLICATION FOR THE DEMOLITION OF THE 20<sup>TH</sup> CENTURY BUILDINGS ASSOCIATED WITH THE JEWSON OPERATION, THE CONSTRUCTION OF A 3,455 SQ M CLASS A1 RETAIL FOODSTORE, FORMATION OF ASSOCIATED 227 CAR PARKING SPACES, NEW PEDESTRIAN LINKS, NEW VEHICULAR ACCESSES FROM CARNSEW ROAD TO SERVICE THE CAR PARK AND SERVICE YARD AREA AND WORKS TO AND WITHIN THE LISTED BUILDING AT THE JEWSON SITE, CARNSEW ROAD, HAYLE

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## 1.0 INTRODUCTION

- 1.1 This assessment is submitted in support of a planning application for the construction of a foodstore, associated car parking and listed building alterations on the Jewson site, Carnsew Quay, Hayle. The site is located on the edge of the Foundry Town Centre within Hayle
- 1.2 The proposed foodstore has a gross internal area of 3,355 sqm with a net sales area of 1,858 sqm. The proposal includes a customer car parking area of 227 spaces. The application is submitted in full.
- 1.3 This report assesses the proposals against the policies and guidance set out in PPS4: Planning for Sustainable Economic Growth and other retail related development plan policies.
- 1.4 As such this document sets out the assessment of the proposals against the key policy tests within PPS4, i.e.

§ Policy EC15: Sequential Assessment

§ Policy EC16: Impact Assessment using the following criteria:

- the impact of the proposal on existing, committed and planned investment within Hayle and within the catchment area of the proposal;
- the impact of the proposal on town centre vitality and viability;
- the impact of the proposal on allocated sites outside town centres being developed in accordance with the Development Plan;
- the impact of the proposals on in-centre trade / turnover and on trade in the wider area;
- whether the proposal is of an appropriate scale in relation to Hayle and its role in the hierarchy of centres;
- any other locally important impact.

- 1.5 The impact of the proposals under Policy EC10 of PPS4 (i.e. its acceptability in terms of sustainability, accessibility, design, regeneration and employment) are covered in detail within the suite of supporting documents (including an EIA) and the Supporting Planning Statement which accompanies the application.
- 1.6 A detailed analysis of planning policies is contained within the Supporting Planning Statement, however, this Impact Assessment also makes reference to the following provisions of the Development Plan, including:
- § Regional Planning Guidance for the South West - September 2001 (RPG10);
  - § Emerging Regional Spatial Strategy for the South West;
  - § Cornwall Structure Plan Policy 14 - Town Centres and Retailing;
  - § Penwith Local Plan Policy TV-16 (Hierarchy in role of centres), Policy TV-17 (Shopping Provision) and Policy TV-D (Site Specific Allocation).
- 1.7 Detailed reference is also made to the Penwith Retail Study (PRS) dated December 2007. The PRS has examined the potential need for retail floorspace in the Penwith District between 2007 and 2026. It was underpinned by a survey of 800 households across 8 zones. It establishes that there is a retail floorspace capacity of up to 1,500 sqm of convenience goods, and up to 2,200 sqm of comparison goods by 2012.

### **Scoping**

- 1.8 A scoping opinion has been sought from the LPA in order to ensure that a robust assessment under PPS4 has been undertaken. The scoping opinion was sought through a letter dated 17<sup>th</sup> February 2010 to Cornwall Council. The scoping was agreed as evidence by return correspondence from Jeremy Content of Cornwall Council dated 23<sup>rd</sup> February 2010. This exchange of scoping correspondence is reproduced at Appendix 1.
- 1.9 In summary, the scoping has agreed the following:
- § the tests / policies to be applied under PPS4;
  - § the sequential sites to be assessed;
  - § the robustness of the Penwith Retail Study - December 2007;
  - § the catchment area for the Impact Assessment.
- 1.10 This has been applied throughout the assessment documented in this statement.

1.11 This assessment is structured as follows:

- § Section 2 provides a summary of the application site and the proposals, including setting out the context of the other retail proposals within Hayle at the present time;
- § Section 3 sets out the retail policy context;
- § Section 4 sets out a review of the PRS and makes reference to the other published retail studies and the recent assessment of Retail Planning Policy undertaken by GVA Grimley in respect of the ING and Sainsbury's applications;
- § Section 5 sets out the detailed assessment against PPS4 including the sequential assessment and the impact assessment, addressing the trading effects of the proposed foodstore;
- § Section 6 sets out the conclusions.

## 2.0 APPLICATION SITE AND PROPOSALS

2.1 This section sets out a brief description of the site, its context in terms of its location, and local plan allocation and other retail proposals within Hayle at present.

### The Site

2.2 The site lies within the Hayle Harbour Area Mixed Use Allocation set out under Policy TV-D of the Local Plan.

2.3 The site is well-located in relation to the Foundry Town Centre, being within circa 150m walking distance of the edge of the designated town centre. The application site is located in an edge of centre location relative to the Foundry Town Centre under the definition set out in PPS4.

2.4 The application site comprises the existing Jewson builders yard and its structures. A parcel of land under separate ownership to the west of the Jewson site is also included within the application site. This adjacent parcel is currently accommodates a retail outlet (formerly Gulfstream Scuba Ltd) and an area of waste ground. The Jewson operation is to be relocated within Hayle.

### Development Plan Allocations

2.5 The application site is subject to allocations set out within the Penwith District Local Plan. The site lies within saved proposal TV-D which covers the area surrounding the site including South Quay / Foundry Yard and North Quay and East Quay.

2.6 The allocation is for a proposed redevelopment of the sites for a mix of uses including Classes A1, A2, A3, B1, B2, B8, C1, C3, D1 and D2. Full details of the policy are set out within the accompanying Planning Statement.

2.7 The policy includes a requirement for the close integration of town centre uses in terms of both location, orientation and pedestrian movement.

2.8 The supporting text of the policy states that developers will be required to undertake a needs assessment if a proposal is made for any substantial retail, leisure or other town centre-type development.

- 2.9 The Hayle Harbour area also includes the North and South Quay areas which have recently been subject to a resolution to grant permission (subject to a Section 106 Agreement) for a large scale mixed use development. This is discussed further below within the retail context of the site.
- 2.10 The application site is, however, subject to a mixed use (including Class A1 Retail) allocation.

**The Proposal**

- 2.11 The proposed operator for the foodstore is Morrisons Plc. The proposed scheme comprises a total net sales area of 1,858 sqm. The proposed split of sales floorspace is as follows:

Size		Food / Non Food Split	
Gross	Net	Convenience sq m	Comparison sq m
3,355 sq m / 36,115 sq ft	1,858 sq m / 20,000 sq ft	1486 (80%)	372 (20%)

- 2.12 The store will have a full Morrisons Market Street Area for the sale of fresh food and fruit/vegetables, together with a wide range of counters serving meat, fish, bread/cakes, salads/sandwiches and hot food. We can confirm that there will be no concessions provided in the Morrisons store.
- 2.13 Morrisons remains a grocery-focused business, and unlike its competitors the Company only offers a modest comparison-food range within its stores, amounting to around 20% of products sold overall (typically the comparison range in Tesco, Sainsbury's and Asda main foodstores is 30-50%). The comparison goods range does not include any clothing or footwear, and is very much geared to impulse and seasonal purchases. This ensures that the comparison offer does not detract from the purpose-made town centre non food shopping trip.
- 2.14 The scheme will be served by a total of 227 parking spaces, incorporating 11 disabled spaces and parent and toddler family spaces. Furthermore, 10 cycle stands are provided and motorbike parking- within the shelter of the used building. These will not only serve customers of the proposed foodstore but also, due to the location of the site, serve to provide linked trips to the Foundry Town Centre.

- 2.15 The size of the foodstore is commensurate with the identified needs set out within the PRS. It will therefore be capable of meeting the bulk food shopping needs of residents in the primary catchment area and in particular in the Hayle area, which is identified as Zone 3 within the PRS.
- 2.16 At present, households within the PCA have to travel outside of Hayle by car to supermarkets in surrounding towns. The pattern of shopping is such that the supermarkets used by residents of Hayle are outside of the PCA and therefore a significant number of car borne trips are being made in order to serve the food shopping needs of the town. The PRS identifies that there is a significant leakage of main food shopping trips and expenditure, in particular to out of centre foodstores in Camborne and Penzance. The proposed foodstore will therefore not only enhance the existing town centre but will also assist in clawing main back food shopping trips currently outside of Hayle.

#### **Context of Retail Provision**

- 2.17 Hayle is a town of approximately 8,500 population, situated on the west coast of Cornwall. The town centre itself is split over two distinct centres, Foundry and Copperhouse. The town attracts a significant number of tourists year-round as a result of its coastal location and high quality environment. The existing retail provision in Hayle, and the neighbouring St Ives, includes a number of retail units that are specifically orientated towards tourism.
- 2.18 Supermarket provision within the town centres is limited, with the Co-op at Copper Terrace being the only in-town supermarket at 996 sqm (net sales area). Out of centre provision is made in the form of Lidl at Carwin Rise (1,407 sqm net) and the M&S Simply Food at the West Cornwall Retail Park (465 sqm net).
- 2.19 The neighbouring town of St Ives has two small Co-ops within the town centre with out of centre provision at one small Co-op and a Tesco at St Ives Road, Carbis Bay.
- 2.20 As discussed in greater detail within the following chapters, 73% of shopping trips are leaking to other stores and centres outside of Hayle. The majority of shopping trips are made to Tesco in Camborne, followed by the Tesco in Penzance, Tesco Extra at Pool, and finally Morrisons at the Long Rock Business Park, Penzance.

- 2.21 Hayle is identified as a main town within the Cornwall Structure Plan. The lack of a supermarket at present clearly therefore leads to a significant leakage of bulk food trips, largely to out of centre locations in surrounding towns which are reliant upon the use of the car.
- 2.22 Therefore, there is considered to be a need to claw back the loss of retail provision in order to considerably upgrade the shopping offer of Hayle Town Centre as a whole.
- 2.23 A supermarket is required in order to make the centre a more convenient and attractive food shopping destination and to significantly reduce the need for a frequency of unsustainable car-borne food shopping trips to other shopping destinations. A proposed supermarket is therefore required in order to sustain and enhance Hayle Town Centre in accordance with national, regional and local planning policy.
- 2.24 This impact assessment will go on to demonstrate that the application site and the proposals are the most appropriate in order to serve this pressing need. Given that there have been other proposals for foodstore development in the form of withdrawn planning applications, these are also considered as part of the context.
- 2.25 The recent proposals are summarised below:

*Hayle Harbourside*

A resolution to grant planning permission subject to a Section 106 was made in March 2009. The outline application proposals incorporated 13,198 sq m of food, drink and retail space. The proposals are located in edge of centre and out of centre locations.

*Hayle Harbourside South Quay*

Following the resolution to grant permission detailed above, ING Real Estate Development (Hayle Harbour) Ltd submitted but subsequently withdrew, an outline planning application for a foodstore on South Quay. The site lies adjacent to the application site. It is classed as 'edge of centre'. ING have stated that they are to revise and resubmit their application following further consultation.

The proposal withdrawn was to replace a significant element of the previous scheme with a foodstore with a total net sales area of 3,159 sqm. The proposals included a

café and four ancillary retail / restaurant units with a total net floorspace of 149 sqm. The scheme included a car park of 341 spaces. ING do not currently have a named operator.

The proposal for a foodstore on the South Quay site has raised significant concerns with regard to heritage and design. The proposal would replace proposals for a regeneration of Hayle Harbour which had been carefully devised with the support of the local authority. The outline application was withdrawn following major concerns over heritage and visual impacts expressed by ICOMOS, CABA and English Heritage.

#### *Land at Marsh Lane, Hayle*

Sainsbury's Supermarkets Ltd and Cranford (Hayle) LLP submitted a full planning application for an out of town foodstore with a gross internal area of 4,983 sqm and a net sales area of 3,042 sqm (ref: 09-1273-P). The proposals included a 325 space customer car park and a petrol filling station. The proposal was on a greenfield site in an out of town location and was therefore contrary to national, regional and local policy. The application was withdrawn in March 2010. The applicants have stated that they intend to resubmit a revised application in the short term.

#### *Memorial Park, Hayle RFC*

Asda are currently formulating a planning application for the above out of centre site. It is known that, following a public exhibition of proposals, the proposal is to relocate the rugby ground and built a new major foodstore and other business units in its place. The proposals detailed on their consultation website suggest a net sales area of 36,000 sqft (3,334 sqm) with a 410 space shoppers car park and an additional 60 space overflow car park for shoppers using the West Cornwall Shopping Park.

- 2.26 Of the above schemes, the ING South Quay site and the Sainburys Marsh Lane site have been subject to applications to the Authority. The Asda application is understood to be under preparation and due to be submitted imminently.

#### **Merits of the proposal**

- 2.27 The proposal has significant locational benefits in that it lies on the edge of the Foundry Town Centre. The following chapters will demonstrate that there are no sequentially preferable sites within the town centre to accommodate the development

required in order to claw back the lost expenditure from Hayle and to meet the identified retail need.

- 2.28 Of the competing schemes outlined briefly above, both the Asda and the Sainsbury's proposals are wholly contrary to planning policy given their out of centre location, when there are sequentially preferable sites available, and in the case of the application site are also suitable and viable.
- 2.29 Whilst it is recognised that the heritage context to the application site is of significant importance, the fact that it already contains bulky, non-conforming buildings in the form of the builder's merchants means that they can be replaced with a more sensitive and appropriate building, including one of the scale required in order to accommodate the modern foodstore needs of Hayle.
- 2.30 The South Quay proposals have attracted significant criticism and concern from the consultation responses of the main heritage bodies. As such, the site is not considered to be suitable for the scale of building required for a supermarket development. Therefore the South Quay Site has significant constraints in terms of design/heritage.
- 2.31 As will be demonstrated within the following sections, the application site is the most sequentially preferable, suitable and available site within Hayle to accommodate the identified retail need.
- 2.32 The proposal will allow sustainable linked trips to be made to the Foundry Town Centre due to its location and the existing town centre accessibility. The proposal will therefore deliver many benefits in terms of providing an accessible foodstore which will benefit the vitality and viability of the town centres of Hayle whilst preserving and enhancing Hayle's important heritage.

### **Summary**

- 2.33 The proposed supermarket development will meet an identified need to provide convenience floorspace within the town of Hayle. The proposed development will be closely integrated with the Foundry Town Centre and is ideally placed to not only draw the significant leakage of expenditure from Hayle back to the catchment area, but also to generate linked trips with the Foundry Town Centre. This will result in the reduction of the length and number of journeys made by local residents in connection

with their food supplying needs, and to provide a benefit to the town centres of Hayle themselves.

### 3.0 RETAIL POLICY CONTEXT

3.1 This section sets out the national, regional and local planning policy relevant to the proposed development in terms of retail only. The Planning Statement covers all other planning policy-related background.

#### National Planning Policy

##### *Planning Policy Statement 4: Planning for Sustainable Economic Growth*

3.2 The new PPS4, published at the end of 2009, combines town centre and economic development policies into a single streamlined statement. PPS4 aims to support sustainable economic growth, protect local markets and small shops and help councils make decisions to speed up economic recovery in towns and rural communities. It replaces previous guidance on retail including PPS6 and parts of PPG13.

3.3 The main aims of the policy statement are to:

- § promote all forms of economic development;
- § continue the emphasis on the requirement to promote town centres as the preferred location for retail, leisure and office development;
- § create a flexible planning framework to assess the wide range of economic uses that will revitalise the National Economy.

3.4 The PPS widens the definition of economic development to include developments such as large foodstores, which now falls under 'main town centre' uses.

3.5 PPS 4 makes a number of changes to retail planning that had previously been set out under PPS6. Notably, it removes the requirement to demonstrate 'need' for retail and leisure development, rather it replaces the previous requirements to demonstrate that sites in town centres cannot be developed by a more stringent assessment of the sequential approach to site selection, together with a more robust impact assessment.

3.6 The PPS requires an impact assessment for planning applications for retail development over 2,500 sqm not in an existing centre and not in accordance with an

up to date development plan. Notably, PPS4 does not include a competition test which has previously been mooted.

- 3.7 The PPS sets out 10 development management policies to provide guidance for the consideration of planning proposals. The overarching policy on determining the planning applications requires councils to adopt a positive and constructive approach to planning applications for economic growth and that applications that secure sustainable economic growth should be treated favourably.
- 3.8 PPS4 provides five impact considerations for all applications and under Policy EC10 including:
- § impacts on carbon dioxide omissions and climate change;
  - § accessibility of the proposal by a choice of means of transport;
  - § whether the proposal secures a high quality and inclusive design;
  - § the impact on economic and physical regeneration in the area;
  - § the impact on local employment.
- 3.9 The above matters are principally assessed within a suite of supporting documents to the application including; The Environmental Statement (ES), Transportation Assessment (TA), the Design and Access Statement (DAS) and the Heritage Statement. The accompanying Planning Statement ties together an overview of these assessments.
- 3.10 This document principally assesses the sequential tests and the impact assessment required under Policy EC15 and EC16 of PPS4.
- 3.11 Policy EC15 requires the consideration of sequential assessment for planning applications for main town centre uses (i.e. the application proposal) that are not in a centre and not in accordance with an up to date development plan. In this instance, the proposals are edge of centre and, whilst the adopted local plan policy includes retail within the mixed use allocation, the allocation does not specifically refer to a foodstore. For robustness therefore, a sequential assessment is to be undertaken in order to address Policy EC15.
- 3.12 Policy EC16 requires an impact assessment for planning applications for main town centre uses (i.e. the application proposal) that are not in a centre and not in accordance with an up to date development. For the same reason that we are

assessing Policy EC15, we also carry out an Impact Assessment in order to address Policy EC16.

- 3.13 Significantly, PPS4 no longer includes the requirement to demonstrate the need for retail development that was previously included in PPS6. However, Policy EC1 requires that local authorities use evidence to plan positively for such a development. EC1.3 states that an evidence base at a local level should, inter alia, assess the detailed need for land or floor space for economic development, including for all main town centre uses over the plan period and, should identify any deficiencies in the provision of local convenience shopping and other facilities which serve people's day to day needs.
- 3.14 The PRS (discussed in detail in the following chapter) from December 2007 remains a robust assessment of the former Penwith Council area. It assesses need for convenience and comparison floor space of the former plan period and up to 2021. As such, this is considered to be a robust evidence base to assess whether a need exists and to assess the impact upon existing centres and plan need developments required under Policy EC16D.
- 3.15 Assessments under EC15 and EC16 are set out in detail within Section 5.

### **Regional Planning Policy**

#### *RPG / RSS*

- 3.16 The adopted Regional Planning Guidance for the South West (RPG10) was adopted in September 2001. This is to be replaced by the emerging Regional Spatial Strategy (RSS). The RSS has reached an advanced stage of preparation but its progress has stalled at present due to wider issues in relation to the sustainability appraisal.
- 3.17 Both RPG10 and the RSS pre-date both the superseded PPS6 and the current PSS4. The tests now set out within PPS4 are therefore considered to supersede those within the 2001 RPG10 document. However, for robustness, EC6 'Town Centres and Retailing' requires the consideration of the following:

- § encourage town centre developments of an appropriate scale in keeping with the town's size and functions;

- § ensure that developments are located where they will contribute to the regeneration and environment improvement of town centres;
- § ensure that developments can reduce the need to travel and encourage journeys by those other than the private car;
- § ensure that the vitality and viability of existing centres is protected and enhanced, notably by assessing the need for new development and by applying the sequential approach to site selection. For convenience shopping, a distribution of provision should be maintained that minimises the length and frequency of trips, so that any settlement of reasonable size has access to all normal day to day necessities. Such a provision should be in keeping with the scale of the centre and the catchment that it conveniently services so as not to encourage longer trips or to undermine the viability of other nearby centres.

3.18 The tests set out in the up to date PPS4 require an assessment of the impact upon vitality and viability and the sustainability themes set out within RPG10. Consequently, it is considered that a robust assessment under PPS4 will adequately address the policies of RPG10 in any event. A separate assessment is not therefore required.

3.19 Should the RSS be issued, it will supersede both RPG10 and the Cornwall Structure Plan (discussed below). Policy TC1 is relevant in this case, 'City and Town Centres'. This seeks to ensure that vitality and viability of the region's existing network of city and town centres is maintained and enhanced. It states that the scale of new investment in retail and other facilities within town centres should take full account of the changing patterns of behaviour and future levels of population growth. Paragraph 8.4.12 states that:

*"Provision for retail, office, leisure and other town centre uses will need to be provided in step with the needs generated by economic and population growth. The challenge will be to provide this in sustainable locations, based on the town centre's first sequential approach. Policies and proposals developed by local authorities, developers and other agencies for development in town centres should follow guidance given in PPS6. They should seek to readdress existing imbalances in the provision of facilities and services, to improve the centre's offer relative to its role and function and help to bring forward more sustainable patterns of use. Proposals facilities at out*

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*of town centre locations should not be detrimental to the regeneration, vitality and viability of the centre.”*

- 3.20 The sequential approach remains within PPS4 as does the importance of ensuring the proposals are in scale with the town size and function. As such, an assessment under PPS4 will robustly examine the requirements of the draft RSS.

*Cornwall Structure Plan*

- 3.21 The Cornwall Structure Plan (adopted 2004) sets out the strategic context for the future development in the County in the period to 2016.
- 3.22 Policy 14 ‘Town Centres and Retailing’ prioritises the improvement and enhancement of town centres to meet the needs and aspirations of the whole community. The policy states that such developments should be in or adjoining town centres where they can help sustain vitality and viability and contribute to the improvement of the town centre environment where they can be accessible to all sectors of the community by choice of means of transport. The policy encourages development in locations to be well-integrated with towns, that they will not be harmful to vitality and viability and that consideration be given in the role of retail development on the physical and economic regeneration of urban areas.
- 3.23 The policy states that major proposals should support the role and function of the Strategic Urban Centres (SUCs). Hayle is not one of the seven SUCs in Cornwall, however, supporting paragraph 87 to the policy recognises that a rigid hierarchy is not appropriate given the similarities in the scale and function of many of Cornwall’s towns. It recognises that a rigid hierarchy could unnecessarily constrain the ability of centres to adjust the training opportunities and needs.
- 3.24 Policy 25 requires development in main towns to be well-integrated with or within the built up areas and to support the role and function of centres. Hayle is recognised at paragraph 139 as an other ‘main town’ that plays an important role as a local centre for shopping, employment, community facilities and as leisure and tourist destinations. It is recognised as having the capacity to meet the needs of the surrounding area as well as its own population.

### **Local planning policy**

3.25 Work on the Penwith Local Development Framework (Penwith LDF) had commenced prior to the formation of the Unitary Cornwall Authority. The Development Plan documents produced thus far are currently being held in abeyance pending the future direction of the One Cornwall Local Development Framework (One Cornwall LDF). The LDF will eventually replace the Local Plan under Section 38(6) of the 2004 Act. However, certain policies within the local Plan were saved in September 2007 and as such the Penwith District Local Plan is considered to be the extant Statutory Development Plan, having been adopted in February 2004.

#### *Penwith District Local Plan*

3.26 The key policy of relevance to this assessment is saved Proposal TV-D and Policies TV-1, TV-16 and TV-17. These are considered in turn below:

- § Policy TV-1 identifies Hayle as being one of the towns where the majority of development within Penwith will be focused.
- § Policy TV-16 covers major retail developments. It states that these should be located in the town centres of Penzance, St Ives and Hayle where the greatest benefits to the community can be provided in terms of accessibility and the contribution to the vitality and viability of the town centre. In terms of the retail development, the sequential approach is required by the policy.
- § Policy TV-17 covers proposals for shopping facilities in edge of centre and out of centre locations. It requires that the sequential test under Policy TV-16 is met, that there is a need for the development that cannot be met for the town centre and, development will not lead to a significant reduction in the range of retail in any town centre or adversely affect the vitality and viability of any town centre. In addition, Policy TV-17 requires proposals to be accessible, compatible with surrounding land uses and not materially affect the viability of village or neighbourhood shops.
- § Policy TV-D allocates the site for mixed use development, promoting redevelopment for uses within Classes A1, A2, A3, B1, B2, B8, C1, C3, D1 and D2 of the Use Classes Order.

- 3.27 The application site is therefore allocated for mixed use to include Class A1, under an adopted and saved Local Plan policy. Other policies within the Plan require a sequential test, the need to be demonstrated and, that proposals not to adversely affect the vitality and viability of any town centre.

*Emerging Local Development Framework (LDF)*

- 3.28 As explained above, the Penwith LDF is likely to be incorporated into the One Cornwall LDF in due course. However, Penwith LDF Development Plan documents have been prepared. The Core Strategy (Preferred Options) and the Hayle Area Action Plan (Issues and Options) have been produced and put out to public consultation. These are considered below.

*Penwith Core Strategy*

- 3.29 The Penwith Core Strategy (Preferred Options) was published in February 2008 and is a material consideration for development control purposes although it is recognised that it carries only limited weight given its lack of progress through the system.

- 3.30 Preferred Option CS15 'Town Centres and Retail' is most relevant to this proposal. CS15 seeks to:

- § maintain and improve the role of Penzance, St Ives and Hayle;
- § increase the retail provision in Hayle;
- § encourage development proposals for main town centre uses which seek to improve the vitality, viability and character of the town centres;
- § retain and enhance town centres as a focus for retail, leisure, office or other main town centre uses;
- § sustain and encourage the diversity of main town centre uses, approach to the role, function and location of individual town centres throughout balance of development, regeneration and conservation; and
- § improve the attractiveness, accessibility and environment of town centres.

3.31 The Core Strategy states that retail development should be guided by the PPS6 sequential test. It states that where retail development cannot be accommodated within a town centre, it should be demonstrated that:

- § there is a need for the development;
- § the development is of an appropriate scale;
- § there are no unacceptable impacts on existing town centres; and
- § locations should be accessible by a range of means of transport.

#### *Area Action Plans*

3.32 Penwith District Council have produced draft AAPs for Penzance and Newlin; Hayle; St Ives and Carbis Bay; and rural Penwith. The Hayle AAP was one of two documents progressed to a consultation stage prior to the decision to progress a One Cornwall LDF.

3.33 The Hayle AAP issues an options consultation took place from January to March 2008, with the findings presented to Committee in July 2008.

3.34 The Penwith Retail Study was used to determine the retail strategy for Hayle, as set out in the draft AAP. The APP reiterates the small amount of shopping expenditure currently being retained in Hayle. As such, in paragraph 7.3.21, the Council considers the harbour area as being the most appropriate opportunity, in line with the Penwith Local Plan allocation, to accommodate the level of need identified. This is subject to the proviso that such retail provision is integrated within the existing Foundry centre.

3.35 One of the 13 draft objectives of the Hayle AAP was to ensure its viability by increasing its attraction and effectiveness as a vital, cultural and prime shopping, entertainment and leisure destination that provides the needs of the community and visitors through the promotion of appropriate development in suitable accessible locations.

#### **Cornwall Council**

3.36 Penwith District Council was amalgamated into the new Unitary Authority for Cornwall, which came into effect in April 2009.

- 3.37 The LDF is at a very early stage for the new Authority, with the first draft of the LDS having been published in 2008. The Core Strategy is currently programmed to be ready for adoption in early 2012. It is anticipated that the 2007 PRS will be one of the evidence base documents used to inform Council's Core Strategy and other LDF documents.

### **Summary**

- 3.38 The application site lies in an edge of centre location, albeit allocated for a mix of uses to include Class A1 retail under adopted Local Plan Proposal TV-D.
- 3.39 Given that the site is not specifically allocated for food retail within an adopted development plan, and in order to provide a robust and transparent assessment for the application, a decision has been taken to undertake the sequential assessment and impact assessments required under Policies EC15 and EC16 of the newly published PPS4. This scoping has been approved by Cornwall Council of the assessment.
- 3.40 Regional and local plan policies support the application of the sequential assessment and require need to be demonstrated in order to satisfy policy tests.
- 3.41 Whilst PPS4 provides more up to date guidance and policies than any of the development plan policies, a robust assessment is considered appropriate. PPS4 no longer requires need to be demonstrated, therefore given that there is an up to date retail study which establishes a need for the levels of floor space required, the assessment concentrates on impact rather than the proposals will have in line with Policy EC16 than seeking to establish need from first principles.

#### 4.0 REVIEW OF PUBLISHED RETAIL STUDIES

- 4.1 This section sets out the context of the proposals in terms of published retail studies. It sets the context for the impact assessment of the proposed development on the town centre and other planned retail developments within the catchment area, and the context for the primary catchment area for the impact assessment.
- 4.2 This section details the findings of the Penwith Retail Study (PRS) of December 2007. It has been confirmed that this study remains up to date and relevant and therefore can form the basis for the assessment of the proposals.
- 4.3 Alternative schemes have also been submitted to the Authority and later withdrawn in relation to the South Quay site and, in an out of centre location at Marsh Lane. These proposals have been supported by their own retail impact assessments under the guidance of PPS6. These are also reviewed and commented upon for completeness as part of the Impact Assessment in Section 5.
- 4.4 A report by GVA Grimley was commissioned by the LPA in order to assess the alternative supermarket proposals by Sainsbury's and ING. The *report "Assessment of Retail Policy - Proposed Retail Stores at South Quay and Marsh Lane, Hayle"* was published in March 2010. The findings of this report are relevant and are considered at the end of this section, and referred to in Section 5.

##### **Penwith Retail Study December 2007**

- 4.5 The PRS was commissioned by Penwith District Council and carried out by GVA Grimley, with the completed report being produced in December 2007. The document was commissioned to enable options to be developed and tested through the Local Development Framework process, in order to enable a robust retail strategy and policies to be developed for Penwith's main towns for Penzance, St Ives and Hayle.
- 4.6 A Cornwall-wide retail study has also been commissioned by the One Cornwall Council which is due to be completed during the spring of 2010. Therefore, at the present time the PRS represents the most up to date and robust planning evidence for the district.
- 4.7 The PRS is based upon robust empirical evidence provided by a household survey.

- 4.8 The PRS identified shopping patterns and financial performance of Hayle (amongst other towns). The key findings in relation to Hayle are summarised below.

*Quantitative analysis*

- 4.9 The PRS established the performance of the town centres and out of centre retail provision within Penwith as of 2007. This was used as a basis for a forecast of the need for further retail floorspace to the year 2021.
- 4.10 The study concluded that there was an indicative capacity in Hayle by 2012 for a minimum of £7 million surplus expenditure, which would rise to £8 million in 2016 and £9.3 million by 2021. These figures relate to baseline figures and represent expenditure that could be retained locally and within Hayle if new retail floorspace was to be provided.
- 4.11 The PRS calculates capacity on the basis of the above figures for new retail floorspace, utilising indicative sales density. The PRS concludes that there is need for the additional floorspace in Hayle as follows, split into convenience and comparison floorspace.

**Recommended levels of retail floor space in Hayle 2007-2012**

**Quantitative Need**

**Table 1 - Convenience**

2012	2016	2021
679 to 1,500sqm net (£7m-£15.4m)	762 to 1,600sqm net (£8m-£16.9m)	864 to 1,750sqm net (£9.3m-£18.8m)

**Table 2 - Comparison**

2012	2016	2021
105 to 2,200sqm net (£0.6m-£11.8m)	556 to 2,900sqm net (£3.2m-£16.6m)	1,219 to 4,000sqm net (£7.5m-£24.5m)

Source: Penwith Retail Study December 2007

- 4.12 The tables set out higher and lower figures to represent two different scenarios. The scenarios are either a 'constant market share' or a 'revised market share'. The former scenario would be a 'stand still' approach, without any significant new or improved retail provision. The latter strategy (i.e. the higher figure) is based upon a need for a step change in retail floorspace provision - as recommended within the conclusions to the PRS.

4.13 Furthermore, the PRS recommends that the convenience floorspace should be located within a single retail facility providing a main / bulk food shopping destination in Hayle.

*Qualitative analysis*

4.14 The PRS established that there is significant leakage of expenditure to other areas. The following table establishes the leakage of main food shopping trips from Hayle and St Ives, given that Hayle and St Ives combined are considered to be the Primary Catchment Area (PCA) for the proposed store (The PCA has been established through the scoping responses provided in relation to the ING proposals at South Quay, Hayle - see below).

**Table 3 - Leakage of Main Food Shopping Trips from PCA**

Operator	Address	Zone 2 (%)	Zone 3 (%)
Tesco	Wesley Street, Camborne	17.0	29.8
Tesco	Branwell Lane, Penzance	6.4	11.7
Tesco Extra	Station Road, Pool	7.4	9.6
Morrisons	Long Rock Business Park, Penzance	5.3	11.7
	<b>TOTAL</b>	<b>36.1</b>	<b>62.8</b>

*Source: Penwith Retail Study - Household Survey (2007)*

4.15 The above figures relate to 'main food' shopping trips. The PRS also identifies approximately 50% of 'top up' food up shopping trips being lost from Hayle.

4.16 Given that St Ives is within the primary catchment area of the proposal, it is of relevance to note that the PRS recommends a strategy in the form of a constant market share for St Ives due to the lack of physical site opportunities and the constrained street pattern within the town. The recommended strategy for Hayle is for a 'revised market share', as explained above.

4.17 The key conclusions of the PRS in relation to Hayle and to this proposal are as follows:

- § there is firm evidence that there is significant leakage of retail expenditure from Hayle which is lost to other towns;

- § the study recognises that Hayle is the settlement in the (former) Penwith district which is in most need of a step change in retail provision and shopping patterns behaviour;
- § the study recommends that Hayle should pursue a revised market share approach in order to increase retail provision and influence shopping patterns, the primary aim of which being to stem leakage to other areas and improve the town's economic performance and the attractiveness and vitality of the town centre;
- § the PRS identifies Hayle Harbour as the key mixed use (including retail) development opportunity in Hayle and within Penwith. This includes the application site;
- § the study concludes that there is not a need for 'out of centre' retail development due to the opportunities within Penwith provided by town centre or edge of centre redevelopment opportunities.

#### *Primary Catchment Area*

- 4.18 Agreement has been reached with the Council that the PCA for the proposed foodstore development on the South Quay site is Zone 2 (St Ives) and Zone 3 (Hayle). Given the proximity of the application site and the ING site, this is considered to remain robust for this assessment.
- 4.19 Zone 1 (Penzance), Zone 4 (Marazion / Breage) and Zone 5 (Camborne) comprised the rest of the study area (ROSA). A copy of the zones taken from the PRS is reproduced at Appendix 2.

#### *Convenience store provision within the primary catchment area*

- 4.20 An overview of existing convenience store provision within the PCAs is provided by way of further background.

#### *Zone 3 - Hayle*

- 4.21 The PRS identifies that in the majority, food retailing in Hayle relates to top-up or basket shopping needs. Hayle is not provided for in the form of a large scale major foodstore, with the largest foodstore provision in the town centre comprising the

existing Co-op supermarket at Copperhouse with a sales area of 995 sqm (net). The store sells only a modest range of food lines. The remaining convenience provision in the two town centres of Hayle (Foundry and Copperhouse) consists of individual shops meeting day to day needs of the immediate walk in catchment, along with passing car borne trade and visitors to the area.

- 4.22 Out of centre provision in Zone 3 comprises of the Marks and Spencer Simply Food outlet at the West Cornwall Retail Park (465 sqm net) and the Lidl at Carwin Rise (1,407 sqm net).
- 4.23 The total foodstore provision in Zone 3 (Hayle) is therefore 2,867 sqm (*Source: PRS December 2007*). Only 995 sqm of this is within a town centre location and there are no food superstores within the zone serving the main bulk food shopping needs of the catchment population.

#### *Zone 2 - St Ives*

- 4.24 The PRS identifies 4 foodstores within Zone 2, which includes Carbis Bay. Provision is dominated by the out of centre Tesco supermarket (1,578 sqm) and a number of small convenience stores in both town centre and out of centre locations. The following stores are identified in Zone 2:

- § Co-op - Treganna Place, St Ives - 260 sqm;
- § Co-op - Royal Square, St Ives - 170 sqm;
- § Tesco - St Ives Road, Carbis Bay - 1,578 sqm;
- § Tesco - The Stennack, St Ives - 234 sqm.

- 4.25 The total provision in Zone 2 for foodstores is given by the PRS as 2,242 sqm. This is dominated by the out of town Tesco supermarket at Carbis Bay. The PRS estimates that the results of the household survey may be underestimating the actual turnover of this particular store, given the observation set out within regarding the customer activity at the store. The remaining provision is small top up basket stores.

#### *Sources of Trade Draw from PCA*

- 4.26 The PRS household survey established the location of the leakage of the main food shopping trips from Zones 2 and 3. Table 3 above identifies the locations of the leakage of main food shopping trips from the PCA.

4.27 The household survey is also useful in identifying the means of transport by which people travel to their main food shopping destination. The following table provides this information.

**Table 4 - Mode of Transport to Travel to Main Food Shopping Destination**

Address	Zone 2 (%)	Zone 3 (%)
Car (driver or passenger)	77.3	92.7
Bus	0.0	1.0
Walk	14.4	2.1
Taxi	1.0	0.0
Other	7.2	4.1
<b>TOTAL</b>	<b>100</b>	<b>100</b>

4.28 Clearly, there is a very high percentage of shopping trips being made by car within the Hayle zone (92.7%). The majority of trips are being made to Camborne and Penzance.

**Possible sites for retail development in Hayle**

4.29 The application site is identified as Jewson (South Quay) (Park Site H1). It states that the site is not the closest part of the harbour area to the existing defined shopping area at Foundry, and on this basis will not be the preferred location for retail uses within the wider harbour development. It advises that the redevelopment characteristics of the site should reflect the wider harbour regeneration proposals to ensure a comprehensive solution to this very important part of Hayle. Therefore, the study recommends that the potential for retail uses on this site should take into account (and not impact upon) the wider regeneration proposals, thus demonstrating a need and compliance with the sequential approach to site selection.

4.30 The Hayle Harbour site is also referred to. The retail study advises that the scale and type of retail on the harbour should be appropriate to the Hayle context. The Marsh Lane and Rugby Club sites (see below) are also mentioned. The retail study advises that each of the sites are not preferred locations for retail development.

4.31 Other current proposals for Hayle have been supported by retail planning assessments, the schemes are summarised below:

**Table 5 - Other Foodstore Proposals for Hayle**

Proposal	Size		Food / Non Food Split		Location
	Gross	Net	Convenience sq m	Comparison sq m	
<b>Morrisons</b>	3,335 sq m / 35,850 sq ft	1,858 sq m / 20,000 sq ft	1486 sq m (80%)	372	Edge of Centre
<b>ING</b>	6,864 sq m / 73,885 sq ft	3,159 sq m / 34,000 sq ft	1895 (65%)	1264	Edge of Centre
<b>Sainsbury's</b>	5,222 sq m / 56,210 sq ft	3,042 sq m / 32,744 sq ft	2129 (70%)	913	Out of Centre
<b>Asda</b>	4,347 sq m / 46,800 sq ft*	3,345 sq m / 36,000 sq ft	Unknown	Unknown	Out of Centre

\*Assumes a 70% gross to net ratio based on a 36,000 sq ft net (in accordance with press releases).  
Figures are indicative and / or assumed figures and are drawn from numerous sources

- 4.32 With the exception of Asda, whose application is yet to be made, the supporting statements for the ING scheme and the Sainsbury's scheme have been analysed in terms of their impact on the town centre within Section 6 of this statement (albeit the applications have now been withdrawn). The WYG household survey conducted in relation to the Sainsbury's proposals has been used in the impact assessment as an update to the PRS survey.

### **Summary**

- 4.33 The PRS forms an up to date and robust study of the retail capacity for Hayle and the surrounding area. The 2007 study clearly identifies a convenience retail need within Hayle, based upon a revised market share strategy, of 1,500 sqm net in 2012, rising to 1,750 sqm net in 2021. The PRS recommends that the provision should be made in a single retail facility to provide a main / bulk food shopping destination in Hayle.
- 4.34 There are no major foodstores within the Hayle PCA which carry the necessary critical mass in terms of their scale and a range of their food offer to claw back shoppers currently travelling by car to large out of centre foodstores outside of Hayle. As such, a significant majority of the local population have little choice but to make car borne trips over relatively long and unsustainable distances to make their main

food shopping trips. This results in significant expenditure leaking from Hayle to large out of town foodstores.

- 4.35 As advocated by the PRS, the proposed foodstore will provide the step change in foodstore provision within Hayle required in order to facilitate a claw back of the main food shopping trips. The retail need exists for the size of foodstore proposed and, its proposed location (adjacent to the town centre) will result in significant claw back with associated spin-off benefits within the town centre, which is wholly in accordance with national, regional and local policy. It can therefore be concluded that up to date retail study has identified sufficient need for the proposed development, notwithstanding that PPS4 no longer explicitly requires a need to be demonstrated at application stage.
- 4.36 The remainder of the assessment therefore goes on to assess the sequential impact tests set out under PPS4, set against this background of need.

**GVA Grimley - Assessment of Retail Planning Policy - Proposed Retail Stores at South Quay and Marsh Lane, Hayle - Published March 2010**

- 4.37 This report was commissioned by Cornwall Council as an independent review of the retail planning policy aspects of the planning applications by Sainsbury's and ING as detailed above. The report was published as part of the consideration of the planning application for the ING scheme for when it was still a live application.
- 4.38 The report draws a number of conclusions which are relevant to the consideration of this application, particularly with regard to the sequential statement of the Jewson and ING sites and in respect of the suitability of the ING proposals.
- 4.39 The key findings can be summarised as follows:

*The Sequential Approach*

- 4.40 The ING application justification was criticised on the basis that they did not adopt a sufficiently flexible response to PPS4 Guidance in respect of the flexible approach to layout and trading format of the proposed development (paragraph 3.5).
- 4.41 The Jewson site was considered to be one of the sites which ING should have looked at and explored more thoroughly in their sequential assessment. This is on the basis that ING's consultant should have shown much more flexibility in terms of the scale of

the proposed retail store. The report recommended that this should guide not only the assessment of the ING application proposal but also other future proposals within Hayle (paragraph 3.5).

- 4.42 The Jewson site was mentioned specifically in the report as being one of the sites to which the ING assessment should have considered in greater detail and with greater flexibility.
- 4.43 Once of the key conclusions by GVA Grimley on the sequential assessment was that the Jewson site is equal in terms of its sequential status to the South Quay site, given that it remains an edge of centre location and has the potential to provide walking distance which is not materially different to the South Quay proposal (paragraph 3.8).
- 4.44 A number of other comments are made with regard to the sequential sites assessed within the town centres. These are cross-referenced within the sequential assessment conclusions set out within Section 5.
- 4.45 In terms of suitability, availability and viability, the report concludes that the South Quay site represents a viable and available opportunity. The GVA report did not draw any firm conclusions in terms of the suitability of the site for the scale of foodstore proposed by ING. Instead, it concluded that there are no sequentially preferable locations to the South Quay site (with the caveat that the Jewson site is equal in sequential terms) and it would be up to Cornwall Council to judge whether the detailed aspects of the proposed development would confirm the suitability of this site (paragraph 3.14).
- 4.46 In terms of the Sainsbury's application on the out of centre site, the report considers that both South Quay and the Jewson site offer 'in principle' sequentially preferable locations with the Sainsbury's planning application site (paragraph 4.14).

*The assessment of impact under Policy EC16 of PPS4*

- 4.47 The report considers that the Sainsbury's application fails to provide sufficient justification in terms of Policy EC16 and EC17 of PPS4 due to the negative impact upon the vitality and viability of the defined town centres in Hayle and, significant negative impact upon the turnover of the convenience retail sector (paragraph 5.7).
- 4.48 The conclusions reached with regard to the ING proposal were that an edge of centre site would offer the opportunity for a greater proportion of local residents to undertake

their main bulk food shop in Hayle and thus reduce the length of car journeys currently undertaken. However, the report goes on to conclude that the potential impact of the proposed foodstore on trade / turnover of existing foodstores could be significant due to the size of the proposal. The concern was that significant impacts could lead to store closures within the convenience sector in the town centres (paragraph 5.8).

- 4.49 The GVA report considers that the proposed South Quay store would widen the range of convenience and comparison goods within Hayle to the benefit of consumer choice, however, it was considered that the information submitted in support of the South Quay scheme did not justify that the proposed foodstore was an appropriate scale for the town centre. Therefore, the view expressed was that a smaller store would perform better against the tests of impact in Policy EC16 of PPS4 (paragraph 5.10).

*Overall conclusions*

- 4.50 The report concluded that the Sainsbury's planning application would have negative impacts upon Hayle's town centres in terms of turnover and vitality and viability and, is not a sequentially preferable site. The South Quay site was considered to perform well against the sequential approach, although no conclusions were drawn in terms of the suitability of this location given its heritage sensitivity.
- 4.51 The impact of the ING proposals was a cause for concern given its size and its potential for financial impact upon the performance of the town centres and the scale of development proposed.
- 4.52 The positive aspects of the ING proposal (impacts upon consumer choice and retail offer, plus accessibility) were considered to be outweighed by the negative impacts relating to the scale of the proposal and financial impacts.
- 4.53 Key to the further consideration of the Jewson site proposals are that the GVA report concluded that a smaller store would be able to offer the same positive impacts as the ING proposal, whilst reducing the severity of its negative impacts and thus attracting a better performance against Policies EC16 and EC17 of PPS4 and the policies in the development plan (paragraph 5.13).

## 5.0 DETAILED ASSESSMENT AGAINST PPS4

5.1 This section examines the tests set out in Policy EC15 and EC16 of PPS4, having established through a review of previous retail studies and impact assessments that there is sufficient need for the development. This section therefore sets out:

- § the sequential assessment;
- § the economic assessment in order to forecast the potential trade diversion and impact of the proposed retail floorspace on existing centres and stores in the PCA;
- § other impacts such as that on vitality and viability; and
- § the acceptability of the proposal in terms of its scale.

### The Sequential Assessment

#### *Policy Requirement*

5.2 Policy EC14.3 of PPS4 states that a sequential assessment is required for planning applications for main town uses that are not in an existing centre and are not in accordance with an up to date development plan. As such, policy EC15.1 sets out that LPA's should:

- a. ensure sites are assessed for their **suitability availability, and viability**.
- b. ensure all **in-centre options** have been thoroughly assessed before less central sites are considered
- c. ensure that where it has been demonstrated that there are no town centre sites to accommodate a proposed development, **preference is given to edge of centre locations** which are well connected to the centre by means of easy pedestrian access
- d. ensure that in considering sites in or on the edge of existing centers, developers and operators have **demonstrated flexibility** in terms of scale, format, car parking provision and scope for disaggregating retail development.

5.3 It is important to reiterate that the application site lies within a mixed use allocation which includes Class A1 retail floorspace. Sequential assessments have been required as part of the assessment of the ING proposals at South Quay, which lie

immediately adjacent and within the same policy designation as the application site. This was specifically at the request of the LPA, therefore, for completeness, and owing to the fact that the policy itself requires a sequential assessment, this assessment includes consideration of Policy EC15.

#### *Assumptions*

5.4 In line with Part 6 of the PPS4 guidance document, we have adapted the checklist to demonstrate compliance with the sequential approach. This outlines the basis on which the assessment has been undertaken, and details all the alternatives considered. In assessing sequential sites, the following assumptions are made:

- § The foodstore business model required by Morrisons requires a site capable of accommodating a total gross area of 3,355 sq m, (36,115 sq ft) with shoppers car parking for 277 spaces, off road servicing and separate delivery and despatch area.
- § The need for a supermarket is localised – to serve the residents of Hayle and to enhance the current provision of the Foundry town centre. The PRS identifies a need for 1,500 sqm of convenience floorspace in Hayle by 2012.
- § The PSA is defined in the Penwith Local Plan.
- § The application site is defined as an 'edge of centre' site.
- § Other edge of centre and town centres have been considered and identified. Such sites have been agreed with Cornwall Council.
- § The sites are thoroughly tested – having regard to their suitability, availability and viability and having regard to the identified need / demand and the timescale over which this arises.
- § The assessment adopts a flexible approach, however, it is material that the PRS recommends that a single large foodstore is provided in order to address all of the need in order to enable the recapture of lost expenditure.
- § Other than scoping of potential sites, there have been no further discussions with the LPA regarding the potential to overcome any obstacles to the availability of more central sites.

*Scoping of Sequential Sites*

- 5.5 The initial scoping for the assessment was carried out in line with the scoping agreed with the Council on the South Quay proposals. There are not considered to be any new / additional sites that would need to be covered as confirmed in our scoping exercise, detailed at Appendix 1.
- 5.6 The following scope has therefore been applied:
- § there are no allocated sites in the defined town centres (Foundry and Copperhouse) on the adopted Local Plan Proposals Map;
  - § two edge of centre sites are allocated in the Local Plan under proposal TV-D (Hayle Harbour). This allocation includes the Jewson site. The ING scoping agreed that only the Jewson site needed to be assessed in their report. In this instance, (and in reverse) only the South Quay site, therefore, needs to be assessed within this impact assessment. The second allocation is under proposal TV-E, the Foundry area;
  - § as per the ING scoping, we address opportunity sites identified within the Emerging Hayle AAP Issues and Options document (January 2008). In this instance, the application site (Jewson) is replaced by the South Quay.
- 5.7 In light of the above, the following five potential sequential sites were subsequently agreed by the Council in the letter dated 23 February:
1. Proposal TV-D – Hayle Harbour, South Quay
  2. Proposal TV-E – Bookers Warehouse
  3. Proposal H-G – R&J Supplies, Copper Terrace
  4. AAP Site H8 - Atlantic Motors, Commercial Rd, Copperhouse
  5. AAP Site H9 – Former Daniels Store, Copperhouse
- 5.8 In addition, it was agreed as part of the ING scoping that a number of vacant units would need to be assessed within both Foundry and the Copperhouse town centres. Further to the above, a review of whether these stores remain vacant has been undertaken in order to determine which are to be considered.

- 5.9 The Sainsbury's agreed scoping included out of centre sites such as North Quay, Loggans Moor and Hayle Rugby Club. Given that the proposal is in an edge of centre location, an assessment of these sequentially less preferable sites is not required.
- 5.10 Detailed pro-formas for each site are set out within Appendix 3 along with a map illustrating the town centre and edge of centre. Summaries are provided with regard to each of the agreed sequential sites below.

**Site 1 - Hayle Harbour, South Quay**

- 5.11 South Quay is in an edge of centre location, directly to the east of the application site. It is contained within the same Local Plan allocation as the application site – for mixed use development under Policy TV-D. Furthermore, it is identified in the draft Hayle AAP as a Potential Development Site for mixed use development (including retail). The site is part of a wider masterplan, which has obtained resolution to grant planning permission subject to a Section 106, from Cornwall Council. This masterplan identifies the site for the development of mixed use residential, business and small scale retail.

*Suitability*

- 5.12 A foodstore of the scale and form required would conflict with Council aspirations for the mixed use, sensitive redevelopment of this prominent site. In light of longstanding political and public interest in, and commentary on, this site, it is well documented that the scale of building required for a major foodstore on this site has been, and would be poorly received. A foodstore at this location would conflict with the visual prominence of the site, the environmental and historic significance of the site, and the need for careful integration with Foundry Square and Penpol Terrace in townscape and heritage terms. This has been confirmed through the significant objections lodged by Heritage bodies in relation to the sale and nature of the building proposed by ING as part of the recent (and now withdrawn) planning application.

*Availability*

- 5.13 By virtue of the withdrawn planning application submitted by ING, it is evident that the site is available for redevelopment.

### *Viability*

- 5.14 It is known that extensive repair work is required to the listed harbour and quay walls before development can progress. Furthermore, the need for flood defence works, ground remediation, and need to raise the levels of the site pose constraints to development.

### *Summary*

- 5.15 Although South Quay is available for development, it is evident from the consideration of the recently withdrawn planning application that there are specific characteristics of the site, and serious constraints to development of a large scale building, which, respectively, question the suitability of the site. It is known that key statutory consultees have raised fundamental concerns over a foodstore development at this location – given its environmental, visual and historic sensitivity. For these reasons, in addition to the Council's aspiration to see a mix of uses on this site, in order to deliver a wider range of regeneration benefits, it is considered that this site is not suitable for development for a large scale foodstore building.
- 5.16 The GVA Grimley March 2010 assessment of retail planning policy report concludes that the South Quay site is available and probably viable but does not draw any conclusions upon the suitability of the site.
- 5.17 The recent withdrawal of the application and the substantial objections by the Heritage bodies to the ING proposals on South Quay are evidence that the site is not suitable for a large scale foodstore due to its Heritage constraints.

### **Site 2- Bookers Warehouse**

- 5.18 The Bookers Warehouse is considered to be an edge of centre site and forms part of the wider allocation TV-E in the Local Plan – for the development of a heritage centre, craft workshops and ancillary retail units. The draft AAP allocates the site for small scale retail to complement the Harveys Regeneration Project. The site measures 0.25ha.

### *Suitability*

- 5.19 The site lacks any frontage to Foundry Square and is poorly connected and integrated with the surrounding uses and highways network. In addition to the traffic and access issues to this site, the site is too small to accommodate a foodstore and associated car parking and servicing of the size required to meet the identified need in Hayle in the form recommended by the PRS. The site is allocated for purposes other than retail, apart from reference to 'small scale' retail to complement the primary allocation.

*Availability*

- 5.20 Bookers are currently trading from the site. Their intentions to relocate are not known and therefore it is considered that the site is unavailable.

*Viability*

- 5.21 The potential relocation costs of Bookers and the cost of overcoming the access difficulties raises concerns over the viability of the site.

*Summary*

- 5.22 In summary, it is evident that the Bookers site, primarily by virtue of its size (taking into account flexibility), is not available or suitable to accommodate the proposed foodstore.
- 5.23 The March 2010 GVA report considers that the site is too small as a realistic alternative (even taking into account flexibility) to accommodate a foodstore of the size required.

**Site 3 - R&J Supplies**

- 5.24 R&J supplies is a 0.7ha site, at an edge of centre to the east of Copperhouse. The site is surrounded by residential development and is allocated in the Local Plan for residential development. The draft AAP envisages a mixed use development to complement the growth of Copperhouse, whilst the PRS suggests that the site is unsuitable for large scale retail development and rather, it lends itself to small scale retail and commercial uses.

*Suitability*

- 5.25 The site is constrained by its conservation area status, potential amenity impact on the dense residential development surrounding it and is too small to accommodate a large foodstore, ancillary parking and servicing area. Furthermore, the site would not offer an opportunity for meaningful retail frontage - making the site unsuitable for commercial retail development.

*Availability*

- 5.26 It is assumed that the site is available for development.

*Viability*

- 5.27 The size and configuration of the site is likely to significantly affect the trading capacity of a foodstore.

*Summary*

- 5.28 With regard to the need for foodstore operators to be flexible, the site is undoubtedly constrained by size and configuration. Development for retail would be contrary to the Development Plan allocation for residential. Furthermore, the lack of any meaningful retail frontage, and direct competition with Co-op and Lidl suggest that, regardless of potential availability, the site is not a viable and suitable option. This assessment accords with the GVA Grimley assessment of March 2010.

**Site 4 - Atlantic Motors**

- 5.29 Atlantic Motors is an edge of centre site, located to the west of Copperhouse town centre. It is a prominent waterside location on Fore Street and is currently trading as a car show room and forecourt. The site is allocated in the draft AAP (Policy H8) as a redevelopment site. The AAP suggest that there is potential to extend the Copperhouse centre to include this site.

*Suitability*

- 5.30 The site is too small to accommodate a foodstore which would serve the identified need. Even with some flexibility, it is not possible for a foodstore of remotely near the

size required to meet identified need in Hayle, with customer car parking, satisfactory access and servicing to be accommodated at this location.

*Availability*

- 5.31 Given that Atlantic Car Sales appears to be trading well from the site, it is considered that the site is unlikely to be available for development.

*Viability*

- 5.32 The size and configuration of the site is likely to significantly affect the trading capacity of a foodstore.

*Summary*

- 5.33 Even adopting a flexible approach to configuration, the site cannot physically accommodate the proposed foodstore. Whilst the site may potentially become available, the site is neither suitable or viable for the proposed development. This assessment accords with the conclusions of the GVA March 2010 report for this site.

**Site 5 - Former Daniels Store**

- 5.34 The Former Daniels Store site is a currently vacant unit which is just 0.17 ha in size and has previously traded as a supermarket. It is identified in the draft AAP that the site is allocated, under Policy H9 for redevelopment. The PRS suggest that any redevelopment scheme should include retail uses on the ground floor in order to maintain and enhance the health of the Copperhouse Centre.

*Suitability*

- 5.35 The site is significantly too small to accommodate a foodstore which would serve the identified need. Even with a large degree of flexibility, it is not possible for a foodstore, with customer car parking, satisfactory access and servicing to be accommodated at this location.

#### *Availability*

- 5.36 Although the site is currently vacant, it is understood that a furniture and furnishing company has completed the purchase of the site – therefore it is unlikely that the site remains an available option. Agents boards have been removed from the site.

#### *Viability*

- 5.37 The size and configuration of the site is likely to significantly affect the trading capacity of a foodstore.

#### *Summary*

- 5.38 By virtue of the small size of the site, the former Daniel's Store site is not a suitable site for the proposed development. Furthermore it is not a viable option, and is considered unlikely, given its recent purchase, to be available for redevelopment. This assessment accords with the conclusions of the GVA March 2010 report for this site.

#### **Vacant Premises**

- 5.39 The health check (see paragraphs 5.56 onwards) illustrates that there are currently 4 vacant premises within both the Foundry / Penpol Terrace and Copperhouse town centres.
- 5.40 Either alone, or collectively as an amalgamation, the vacant units are significantly too small to accommodate the proposed foodstore, notwithstanding the need for car parking. Furthermore, these vacant units are located sporadically throughout the centres, providing no opportunities for amalgamation in the manner which would be required to provide the scale of floorspace to provide the step change in retail provision required by the PRS findings.
- 5.41 None of the identified vacant premises lend themselves to the contemporary convenience goods retailing which is sought as part of this proposal. As such, the units are neither viable or suitable. This assessment accords with the conclusions of the GVA March 2010 report

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### **Conclusions on the sequential approach**

- 5.42 The sequential assessment has demonstrated that the application site is the most sequentially preferable site to be suitable, available and viable to accommodate the size of foodstore required in order to accord with the approach advocated by the PRS.
- 5.43 The only other edge of centre site that could accommodate the size of foodstore required and is available is the South Quay site. There are, however, significant constraints on that site in relation to the proposals for a major foodstore, given the concerns raised by heritage bodies in response to the recent withdrawn application.
- 5.44 It is recognised that the Jewson site lies within, or in proximity to, the same designations as the South Quay site in terms of ecology and heritage. However, the nature of the existing buildings and the character of the Jewson site is such that it can accommodate a building of the scale required for a major foodstore without compromising the World Heritage Status and the character of the surrounding area.
- 5.45 Pre-application consultation with heritage officers has been encouraging in this regard given that it is recognised that there is an opportunity to open up the site and replace the existing non-conforming buildings with a more sensitive and appropriate building. Therefore, whilst a large scale foodstore proposal on South Quay would result in a negative impact in heritage terms, the development of the Jewson site has far greater potential to have positive benefits in heritage terms.
- 5.46 Three sequential sites located in town centre locations have also been assessed. Sites at R&J Supplies, Atlantic Motors and the Former Daniel's Store can be dismissed on the grounds that, regardless of any potential availability, they are physically too small to accommodate a foodstore, and associated car parking, service areas and access, which can meet the identified need in Hayle. In line with national policy, even when adopting a reasonably flexible approach to the size and configuration of the proposed scheme, none of the above sites can feasibly and viably accommodate a foodstore, together with satisfactory access, servicing and car parking arrangements. As such, each of these town centre sites can be dismissed as possible locations.
- 5.47 The proposals by Sainsbury's and Asda are in out of town locations and are considered to be out of scale with the identified retail need for Hayle and its catchment. The Jewson site can adequately accommodate a foodstore of the size

that is required in order to deliver the step change in Hayle's retail offer recommended by the PRS.

- 5.48 Therefore, there are no sequentially preferable suitable sites to the application site.
- 5.49 The above assessment accords with the conclusions set out within the GVA Grimley March 2010 report provided for Cornwall Council. The conclusions of GVA Grimley were that the Jewson site and the South Quay site are on an equal footing in terms of their proximity to and accessibility to the town centre. However, the significant heritage body objections to the introduction of a large scale foodstore on the South Quay site are such that it is not considered suitable to accommodate such a development. The Jewson site is therefore the most sequentially preferable site that is suitable, available and viable to accommodate a foodstore within Hayle.

#### **Impact Assessment under Policy EC16**

- 5.50 Policy EC14.4 requires an assessment addressing the impacts of retail proposals where they exceed 2,500 sqm gross floor space, where they are not in an existing centre and not in accordance with an up to date development. Policy EC16 details the Impact Assessment required in order to assess proposals for main town centre uses. The mixed use allocation covering the site includes A1 retail but not explicitly a foodstore. Consequently, the assessment under Policy EC16 has been carried out for completeness.
- 5.51 Policy EC14.7 states that assessment of impacts should focus in particular on the first 5 years after the implementation of a proposal and the level of detail and type of evidence and analysis required in the impact assessment should be proportionate to the scale and nature of the proposal and its likely impact.
- 5.52 Policy EC16 of PPS4 sets out how planning applications / proposals for main town centre uses that are not in the centre and not in accordance with an up to date development plan should be assessed against the impacts on centres. With regard to this application, the following impacts are of relevance:

- § Impact on existing, committed and planned **public and private investment** in a centre or centres in the catchment area of the proposal;
- § Impact on town centre **vitality and viability** (including consumer choice and range and quality of the comparison and convenience retail offer);

- § Impact on **allocated sites** outside town centres being developed in accordance with the development plan;
- § Impact on in-centre **trade / turnover** and on trade in the wider area (taking into account current and future consumer expenditure in the catchment area up to five years from the time the application is made);
- § Whether the proposal is of an **appropriate scale** (in terms of gross floorspace) in relation to the size of the centre and its role in the hierarchy of centres;
- § Impact on any **locally important centres**.

5.53 Each of the sub-sections to Policy EC16.1 are considered in turn below.

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

5.54 This explicitly refers to impacts on *town centre* developments that are existing, committed and planned. The ING proposals at North Quay / South Quay do not lie within an existing centre and therefore the policy does not require the impact upon those planned developments to be assessed.

5.55 The response from the Council to the ING scoping letter in July 2009 revealed that there are no identified proposals for proposals for convenience goods floor space in the PCA (i.e. floor space with a planning permission, under construction or completed developments). This remains to be the case.

5.56 There is a major public / private sector investment currently planned in Hayle, which is the Harbourside Regeneration. This is in part being brought forward in line with Policy proposal TV-D. A resolution to grant outline planning permission subject to a Section 106 Agreement was made in March 2009. The proposal is a mixed use development, including retail, residential, leisure and employment uses. The proposal does not include for the provision of a foodstore although it does include retail floor space. The South Quay / Hayle Harbour site is not within an identified town centre.

- 5.57 Therefore, this is considered to be more appropriately discussed under EC16.1c which considers allocated sites. The recently withdrawn planning application for a foodstore within the southern element of the quay is also outside of a town centre.
- 5.58 Notwithstanding the lack of requirement to assess these proposals under 16.1.A, the proposed Morrisons foodstore would not compete with the Harbourside Regeneration scheme which has the resolution to grant permission. This is due to the different nature, scale, role and function of the retail floor space proposed in each scheme. The proposed Morrisons supermarket will only complement and enhance the planned regeneration scheme on the basis that it will demonstrate confidence in this part of Hayle and help to bring about the planned-for regeneration of the land within the wider TV-D proposal.
- 5.59 As noted earlier, the ING proposals for a foodstore on South Quay are not considered to be suitable, given the sensitive heritage context of the site.
- (b) *The impact of the proposal on town centre vitality and viability, including local consumer choice and a range and quality of the comparison and convenience retail offer***
- 5.60 PPS4 practice guidance provides advice on how to judge the effects of a proposal on the vitality and viability of a centre. It requires a proper understanding of the vitality and viability of the centre and how it changes over the time, and its vulnerability. Key impacts are listed as being significant levels of trade diversion from the centre undermining vitality and viability by reducing footfall, increased vacancies and a more downmarket offer. The implications on retail diversity, particularly the range, type and quality of goods available are important. In order to assess the vitality and viability impacts, PPS4 requires a clear understanding of the current and potential role of the centre and the market sectors and town centre uses which are key to its vitality and viability.
- 5.61 In order to assess the impacts upon vitality and viability, a health check assessment of the two main centres in Hayle has been undertaken in order to update the information already available within the PRS Health Check. A schedule of uses and vacancies within each centre is contained within Appendix 4.
- 5.62 The key findings are summarised below in respect of each of Hayle's town centres, which are the only two centres that are required to be assessed (as per the terms of the scoping exercise). The West Cornwall Retail Park has not been included given its

lack of any town centre status and its out of centre location. The PRS healthcheck was undertaken prior to the opening of the West Cornwall shopping park and the extension to Lidl. As such, an up to date survey has been undertaken in order to complement the PRS study.

### **Foundry Centre**

5.63 The application is located on the edge of the Foundry town centre. The updated healthcheck demonstrates that it is both vital and viable. The key indicators are summarised below:

(i) *Diversity of uses*

5.64 The composition of the town centre is set out in the table below, using data set out within Appendix 4.

**Table 6 - Composition of Foundry Town Centre**

	<b>Total Number of Units</b>	<b>Total Units (%)</b>	<b>National Average (%)</b>
Convenience	5	14	10
Comparison	13	35	44
Service	17	46	34
Miscellaneous	1	3	1
Vacant	1	3	11
<b>Total</b>	<b>37</b>	<b>100</b>	<b>100</b>

5.65 The Foundry centre contains a total of 37 units, with convenience goods accounting for approximately 14% of the total (national average of 10%). The comparison element of the town centre represents 35% of the total units (national average of 44%). Service units make up 46% of the total (national average 33%). Vacancies currently lie at 3% (national average of 11%).

5.66 The centre is considered to have a relatively strong line up of national multiple retailers for a centre of this size. Convenience provision is limited to independent retailers, in addition to a Martins and a Spar – both would operate exclusively as a top-up shopping destination.

(ii) *Retailer representation*

5.67 National multiple outlets include Boots, Martins and Spar. Service outlets include national banks with convenience retailers. Convenience floor space, other than Spar and Martins, is mainly provided by independent retailers.

(iii) *Vacancies*

5.68 Vacancy rates in Foundry is just 3%. This demonstrates that there is good demand for units and that the centre is healthy.

**Copperhouse**

5.69 Copperhouse provides a more comprehensive offer than the Foundry town centre, given the presence of the largest foodstore in either of the two town centres (Co-op). It includes a mix of national multiple and independent retailers and a diverse range of service facilities. The healthcheck provides the following indicators:

(i) *Diversity of uses*

5.70 The following table provides detail of the composition of the Copperhouse town centre.

***Table 7 - Composition of Copperhouse***

	<b>Total Number of Units</b>	<b>Total Units (%)</b>	<b>National Average (%)</b>
Convenience	4	8	10
Comparison	11	21	44
Service	33	62	34
Miscellaneous	2	4	1
Vacant	3	6	11
<b>Total</b>	<b>53</b>	<b>100</b>	<b>100</b>

5.71 Copperhouse comprises of 53 units. Convenience provision is 8%, below the national average of 10% (this includes the Co-op store). Comparison provision totals 21% (national average 44%). Service uses are well above the national average of

34% at 62% of the total. Vacancy rates are 6% compared with a national average of 11%.

5.72 This indicates that Copperhouse is dominated by the service sector with an underrepresentation of convenience goods in terms of unit numbers.

*(ii) Retailer representation*

5.73 Copperhouse is characterised by independent comparison retailers and a large proportion of service outlets.

5.74 The Copperhouse convenience provision is dominated by the Co-op, which also dominates convenience provision across the two town centres. The Co-op is 995 sqm net. Copperhouse also includes the Premier store which provides for top-up shopping only.

5.75 The Co-op is estimated to be approximately 90% convenience goods covering a good range of everyday essentials. The Co-op has recently been refurbished internally and provides a modern and attractive interior with a good display of goods and stock.

*(iii) Vacancies*

5.76 The Copperhouse centre has a vacancy of 6%, which remains below the national average which shows a reasonable demand for units that the centre is reasonably healthy.

**Combined indicators for Foundry and Copperhouse**

5.77 A number of the indicators of vitality and viability can be considered for the two centres combined. These are summarised below.

*(i) Changes in retailer representation*

5.78 Known retailer interest for Hayle is difficult to establish; however recent applications for foodstores have established that there is operator requirement for a major food superstore of between 3,355 and 6,864 sq m (see Table 5).

(ii) *Accessibility*

5.79 Foundry town centre is easily accessible by a variety of means of transport including the train, bus, car, cycling and walking. Copperhouse is accessible by bus, with good access by pedestrian and cycle modes. The Co-op provides up to 2 hours car parking.

(iii) *Pedestrian flows*

5.80 The 2007 PRS Healthcheck found that both areas were found to exhibit reasonably high levels of pedestrian footfall. On our site visit to undertake the healthcheck, each centre was observed to have good flows of pedestrian activity, given the size and function of the centres.

(iv) *Rental levels / commercial yields*

5.81 The centres are too small to carry out an analysis of rental values or commercial yields due to the independent nature of the deals done and their relatively low ranking.

(v) *Potential for growth or change of centres*

5.82 The centres are relatively constrained as demonstrated by sequential assessment. The proposed step change in foodstore provision within Hayle must therefore be accommodated on an edge of centre site. Therefore the proposals will not impact upon any potential for growth of the centres themselves.

(vi) *Customer's and resident's views and behaviour*

5.83 The PRS includes a survey of shoppers in Hayle. It is significant that it identifies the introduction of a larger supermarket as one of the potential improvements put forward by respondents. This view is supported by feedback received during the public exhibition of plans for the Jewson site.

(vii) *Environmental quality*

5.84 The PRS identified that Hayle requires public realm improvements, particularly along its waterfront and there are planned for regeneration within the Foundry area.

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### **Conclusions on Vitality and Viability impacts**

- 5.85 The healthcheck of the Foundry and Copperhouse town centres demonstrates that each is both vital and viable. Each centre has low vacancy levels and a good range of comparison and service facilities. Across the two centres, the combined provision of convenience outlets equates to the national average. However, Foundry has a higher than national average number of convenience outlets.
- 5.86 In combination, the centres are considered to have a diverse range of uses and with low vacancy rates. The vacancy rates across the two centres (4%) has dropped since the 2007 PRS (7%).
- 5.87 For a town the size of Hayle, a good mix of independent and national multiple retailers are found across the two centres.
- 5.88 The proposed foodstore will meet the identified need and serve the preferred objective to bring about the step change in the foodstore provision in Hayle. The sequentially preferable location of the foodstore and the range of goods that will be offered will act as a significant draw of shoppers to the town centre by virtue of the accessibility of the store to and from the town centre. The store will act as an anchor by drawing shoppers into the centre. Due to the anticipated clawback of expenditure from outside of Hayle and mainly from out of centre foodstores, the proposals will result in a significant benefit to the town centre resulting in spin-off expenditure to the benefit of town centre retailers, increasing footfall and improving the attractiveness of Hayle as a shopping destination.
- 5.89 Turnover impacts are discussed in the following section in relation to the in-town Co-op store at Copperhouse. However, any negative impacts are likely to be out-weighed by the positive benefits that the major foodstore proposed will bring about to existing shops and businesses through the two centres.
- 5.90 These assumptions are underpinned by research on major foodstores which demonstrates that those with good pedestrian links to town centres can generate significant increases in shopping, footfall and expenditure generally throughout the town centre.
- 5.91 Overall, the proposal will have a positive impact upon the vitality and viability of Hayle's town centres, particularly by virtue of its location and the draw that it will present to shoppers which will benefit the wider town centres.
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5.92 The proposal therefore satisfies the test set out under Policy EC16.1.B of PPS4.

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

5.93 There are no other retail allocations specifically for foodstores within the Development Plan, however, the wider Hayle Harbour Area allocated under proposal TV-D allows for a mix of uses including Class A1 Retail. The withdrawn proposals by ING under outline application reference 08 – 0613 falls under this category.

5.94 This has partly been considered under EC16.1.A , given that an application has reached the stage where a resolution to grant planning permission subject to a Section 106 has been given (March 2009) but permission has not been granted.

5.95 The proposal includes the following:

- § 1,039 new dwellings of mixed type, and size, of which 175 will be affordable units;
- § a new Fishermen's Harbour, incorporating a new Harbour Master's Office and a fishing support building;
- § 7,755 sq m of employment space on North Quay, adjacent to both the Wave Hub buildings and the proposed Fishermen's Harbour, providing premises for potential fishing- related processes, marine and energy-related activities;
- § space for primary health care facilities and business centre;
- § a total of 13,198 sq m of food, drink and retail space;
- § a 60 bed hotel and tourist accommodation;
- § a fitness gym;
- § an information centre;
- § a leisure building to support sailing and other water-based activities; and

§ opportunities for landmark buildings on the northern tip of East Quay and South Quay.

5.96 Significantly, the proposal does not include a major foodstore. For the same reasons that the proposal does not conflict with the assessment under 16.1.A it will not create any conflict under 16.1.c; i.e. the proposals are of a different nature and character to those proposed within the ING scheme and, the development of the Jewson site will provide a complementary and beneficial impact to the Harbourside area and the town as a whole.

5.97 It is also highly significant that the Jewson site is within the same policy designation as the ING scheme, and, as highlighted above, will assist in bringing about a more comprehensive regeneration of the TV-D proposals, in tandem with the wider ING regeneration proposals.

**(d) *In the context of our retail or leisure proposal, the impact of the proposal on in-centre trade / turnover and on trade in the wide area, taking account of current and future consumer expenditure capacity in the catchment area up to 5 years from the time the application is made, and, where applicable, on the rural economy.***

*Background*

5.98 The PRS provides a useful insight into shopping provision in Hayle. The household survey (2007) that was used in the PRS shows that in Zone 3 very little trade is retained by food stores in Hayle. Table 5 of Appendix D of the PRS suggests that only £ 7.4m of a total of £21.6m is retained by Hayle stores (Co-op Copper Terrace, Lidl at Loggans and other Hayle stores). This represents only 34% of the total available spending in Zone 3 alone. The PRS suggested that based on a constant market share assumption, only 762 sqm net of additional convenience goods floor space could be supported by 2016 as a result of this low level of retention. However, paragraph 6.26 of the PRS recognised that Hayle should attempt to capitalise on the available spending in the catchment. In this case by increasing market shares, it was assumed that Hayle should be able to retain up to 70% of available spending in Zone 3. It was assumed that this would equate to a new development commitment of 1,500 sqm of additional convenience goods floor space by 2012 and 1,750 sqm by 2021.

5.99 Since the PRS there have been two new developments that have been implemented and include:

- § The opening of the M&S unit at the West Cornwall Shopping Park with a net convenience goods sales area of 465 sqm; and
- § An extension to the existing Lidl discount store at Loggans with an additional 697 sqm of convenience goods floor space i.e. a total additional floor space commitment of 1,162 sqm.

5.100 Therefore, it might be argued that the additional floor space has already been provided. For this reason WYG, the agents for the Marsh Lane site, proposed for a new Sainsbury's store, have commissioned a new household survey to take account of the potentially changed shopping patterns. In common with the PRS household survey, the WYG survey has sought to investigate both 'main food' and 'top up' food shopping trips. The PRS adopted a weighted average between 'main food' and 'top up food' based on the notes to Table 5 Appendix D (of the PRS). Table 8 summarises the findings of the WYG survey adopting a similar main food and top up food split to that used in the PRS (60%/40%).

**Table 8 - Summary of WYG Household Survey - Market Shares in Zones 2 and 3**

Store	Zone 2 %	Zone 3 %	Store Size (convenience goods sales sqm)	Distance from Hayle (approx km)
Hayle Co-op Copper Terrace	1.3	20.8	896	0
Hayle Other	0	0	n/k	0
Hayle Lidl	1.7	9.5	1,126	0
Hayle M&S	1.7	1.3	465	0
Camborne Tesco	2.9	14.9	1,540	10
Penzance Morrisons	7.4	11.9	2,126	12
Penzance Tesco	2.5	8.0	1,812	12
St Ives Tesco	44.9	2.5	1,262	6
St Ives Co-op	8.7	0	222	6
Helston Tesco	0	0.6	1,760	15
Redruth Morrisons	0.9	2.1	2,245	14
Other stores	27.9	28.4		
Total	100	100		

- 5.101 In combination Hayle stores account for only 31.6% of available spending in Zone 3. This is a lower figure than that recorded by the PRS (34%) despite an extension to the Lidl store and the opening of the M&S unit. This suggests that these minor additions to floor space in Hayle have made little difference to the shopping patterns of most of Hayle's residents. The majority of resident's spending continues to leak out from the catchment to out of centre food stores. More than 34% of available spending is accounted for by just three stores in Camborne and Penzance alone.
- 5.102 Table 8 also shows that the degree of attractiveness is proportional to the size of store and inversely proportional to its distance from Hayle. Whilst the two Penzance stores are larger, their greater distance from Hayle means they have less draw on Hayle residents in comparison with the Camborne store. This suggests it will only be necessary to provide a comparable scale of floor space to the closest store to secure the maximum travel distance saving. The average of all of the modern food stores in Table 8 is 1,815 sqm net convenience sales.

*Assumptions of the Impact Assessment*

- 5.103 The impact assessment for the application proposal has adopted the following assumptions:
1. 2007 prices;
  2. Base year of 2010 and design year of 2014 (being 5 years from the date of the other two planning applications and a 5 year period suggested by PPS4 for the assessment of impact);
  3. Convenience goods turnover of £16.5m with £14.1m (85%) being drawn from Zones 2,3 and 5 based on sales density data provided by Morrison's planning agents Peacock and Smith with an assumption of a sales efficiency growth of 0.5%pa;
  4. Baseline market shares based on the WYG household survey with a 60/40% weighted average between 'main and top up' food responses;
  5. Other than the M&S unit and the extension to the Lidl unit there are no other development commitments that need to be taken into account. It is assumed that the WYG Sainsbury's and ING applications are competing proposals all seeking to serve the identified need for improved convenience goods shopping in Hayle.

5.104 Table 9 summarises the turnover of the catchment area stores based upon the findings of the WYG household survey. The assessment has been based on a weighted average of the 'main and top up' food shopping responses which is similar to the approach adopted in the PRS. It is clear from the responses that the survey has not reflected the full turnover of the M&S store at the West Cornwall Shopping Park. In addition the turnover of the Tesco at St Ives appears low given the size of the store and the dearth of competition in the local catchment area.

**Table 9 - Summary of Catchment Store Turnover in 2010 Based on the WYG Household Survey**

Store	Turnover 2010 £m	Sales Density £psm
Hayle Co-op Copper Terrace	5.0	5,576
Hayle Other	0	n/k
Hayle Lidl	3.5	3,135
Hayle M&S	1.4	3,025
Camborne Tesco	21.5	13,952
Penzance Morrisons	21.3	10,008
Penzance Tesco	16.0	8,842
St Ives Tesco	8.5	6,714
St Ives Co-op	1.5	6,990
Helston Tesco	21.6	12,286
Redruth Morrisons	8.4	3,760

5.105 No allowance has been made for tourist spending or turnover derived from beyond the catchment area that may further supplement the turnovers of these stores.

5.106 It is anticipated that the new proposed food store on the Jewson site will divert the majority of its turnover from Zone 3 with lesser amounts drawn from Zones 2 and 5. In addition an assumption has been made that 15% of the store turnover will be drawn from beyond this area. The key assumptions are set out in Table 10 below.

**Table 10 - Estimates of New Morrison's Store Trade Draw**

<b>Zone</b>	<b>% of Total Store Turnover £m</b>	<b>New Market Share in 2014 %</b>
1	0	0
2	20	15.1
3	75	45.4
4	0	0
5	5	1.7
6	0	0
7	0	0
8	0	0

*Findings*

5.107 The resulting market share in Zone 3 of the new store in 2014 is estimated at 45.4%. When combined with the existing Hayle's stores (recorded at 31.6%), the combined Hayle market share in Zone 3 would be 67.9%. This is very close to the 70% trade retention figure suggested by the PRS as being a suitable target for Hayle stores to attain. This suggests that the new store could be accommodated without an adverse impact on existing Hayle stores with the maximum amount of trade being retained by Hayle stores in Zone 3. A larger store would either have to have a more extensive catchment area, undermining the principles of sustainable development, or divert more trade from existing Hayle stores. Table 11 summarises the estimated trade diversions and impacts as set out in Table 5.5 in Appendix 5.

**Table 11 - Summary of New Morrison's Store Trade Diversion and Impact 2014**

Store	Trade Diversion 2014 £m	% Impact 2014	% of New Store's Turnover
Hayle Co-op Copper Terrace	-1.06	-20%	-6%
Hayle Other	0.00	na	0%
Hayle Lidl	-1.06	-28%	-6%
Hayle M&S	0.00	0%	0%
Camborne Tesco	-3.45	-15%	-21%
Penzance Morrisons	-3.21	-14%	-19%
Penzance Tesco	-1.41	-8%	-9%
St Ives Tesco	-2.22	-25%	-13%
St Ives Co-op	0.00	0%	0%
Helston Tesco	0.00	0%	0%
Redruth Morrisons	-0.28	-3%	-2%
Other Stores	-1.41	-1%	-9%
Beyond Zones 2,3,5	-2.45	na	-15%
Total	-16.64		-100%

5.108 Table 11 shows that the greatest diversion falls on the Tesco Camborne which is highly accessible from the A30. Stores in Penzance are also easily accessed from Hayle and account for a significant proportion of resident's spending. Accordingly the Morrison's and Tesco stores, experience significant diversion. Lower levels of diversion are estimated from the Tesco in St Ives. Whilst this store is closer to Hayle, it is less accessible by car. The WYG household survey has not recorded that this store accounts for a significant amount of spending by Hayle residents.

5.109 In terms of stores in Hayle, the greatest level of impact will fall on the Co-op store on Copper Terrace. As the Lidl store has been extended it now provides a wider range of convenience goods. Therefore, a similar level of impact to that recorded by the Co-op store is expected.

5.110 The WYG household survey has not recorded a measurable market share for the M&S store. It is estimated that this store focuses on a 'top up' shopping role and serves a very wide catchment area due to its proximity to the A30 and the West Cornwall Shopping Park that will attract linked shopping trips from a wide catchment area.

- 5.111 The proposed food store will have a market share of 45.4% in Zone 3. As a result of its impact on all Hayle stores the town market share has been reduced from 31.6% to 22.5%. However, the Carnsew Quay site is defined as an edge of centre site therefore and the aggregate market share can be combined (45.4% plus 22.5% is 67.9%). The proposed food store will achieve the objectives of the PRS in increasing the town market share from 31% to 68%. This analysis has been based on the WYG household survey that appears to under record the turnover of the M&S store. Therefore it is more than likely that the new Morrison's store will be able to achieve a trade retention figure in excess of 70% when an allowance is made for the M&S store.
- 5.112 Whilst the new store will inevitably have some impact on stores in defined centres this is to a greater extent focused on the Co-op on Copper Terrace. The new store will benefit from an edge of centre location and increase the overall turnover of the Hayle Copperhouse / Foundry Centre – and therefore the Co-op will not be threatened by the proposed development. There are no town centre locations that could accommodate the scale of development envisaged in the PRS. Therefore the Council must recognise that an appropriate scale of development on a well located edge of centre location is the best option for Hayle to secure an overall increase in its market share.
- 5.113 It is not anticipated that significant impacts will be recorded by the other smaller convenience goods retailers in the Copperhouse and Foundry Centre as these focus on 'top up' food shopping and will not compete with the bulk food shopping role of the new Morrison's store.
- 5.114 The above analysis has assumed that the Morrison's store will draw trade from Zones 2,3 and 5 with a further 15% being drawn from elsewhere. Table 10 makes explicit the assumptions on where the store is anticipated to draw its turnover, Table 5.2 of Appendix 5 demonstrates how this diversion has been attributed to individual stores by zone. These assumptions have been informed by the up to date WYG household survey which shows significant leakage of spending in Zone 3 to outlying out of centre food stores.

*Comparison with Other Competing Proposals*

- 5.115 Table 12 provides a comparison with the impact assessment undertaken by WYG and Strategic Perspectives for competing and larger food store proposals in Hayle.
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**Table 12 - Summary of Trade Diversion of other Competing Food Store Applications**

<b>Store</b>	<b>Savills - Morrisons Carnsew Quay</b>	<b>WYG - Sainsbury's Marsh Lane Hayle</b>	<b>SP - ING South Harbour Hayle (2014 impact year)</b>
Hayle Co-op	-1.06	-0.8	-1.82
Hayle Other	0.00	-0.3	-0.29
Hayle Lidl	-1.06	-1.9	-0.77
Hayle M&S	0.00	-1.6	-1.02
Hayle Londis	0.00		
Hayle other OOT		-1.4	
<b>Hayle Sub Total</b>	<b>-2.11</b>	<b>-6.0</b>	<b>-3.9</b>
Camborne Tesco	-3.45		-6.0
Penzance Morrison	-3.21		-2.6
Penzance Tesco	-1.41		-2.2
St Ives Tesco	-2.22	-4.1	-0.87
St Ives Co-op Royal Sq			-0.03
St Ives Co-op The Stannack	0.00		-0.03
St Ives Co-op Tregenna Place			-0.02
St Ives town centre		-0.3	-0.04
St Ives OOT		-0.5	
Helston Tesco	0.00		-0.3
Redruth Morrisons	-0.28		
Redruth Tesco Extra			-1.8
Other stores	-1.41		-2.7
<b>Sub Total</b>	<b>-10.57</b>	<b>-4.9</b>	<b>-16.59</b>
<b>Beyond Catchment Area</b>	<b>-2.45</b>	<b>-16.4</b>	<b>-3.63</b>
Total	-16.54	-27.3	-24.12

5.116 The turnovers of the other two proposals are approximately 45% greater than the Morrison's application. Accordingly a far higher level of impact will be recorded on all catchment area stores. In broad terms the Savills and Strategic Perspective's assessments are similar in nature with roughly equal proportions of turnover being

drawn from Hayle stores and stores beyond the catchment. In contrast the WYG assessment suggests:

- § far higher impacts on Hayle stores (£6m in contrast to less than £2.1m in the Savills assessment);
- § lower levels of impact on identified out of centre stores in the primary catchment area (£4.9m in contrast to more than £11m in the other studies); and
- § significantly higher impacts on unidentified stores beyond the catchment area (WYG adopt Zones 2 and 3 as the primary catchment area) (£16.4m in contrast to no more than £4m in the other studies).

5.117 This suggests that the scale of development proposed in the WYG application is not well related to the policy objective to increase trade retention in Zones 2 and 3. WYG suggest that far higher levels of impact will be recorded by Hayle stores and the residual of the store's turnover will be drawn from unidentified stores beyond Zones 2 and 3. This approach runs counter to the objectives laid down in the PRS for Hayle to increase its trade retention in zone 3 at the expense of out of centre stores nearby.

#### *Conclusions*

5.118 It has already been well established that convenience goods shopping provision in Hayle is limited and fails to retain an appropriate level of spending in Zone 3. At the time of the PRS neither the M&S store nor the Lidl store extension had been implemented.

5.119 An updated household survey is helpfully included in the application submission made by WYG. This shows that the market share for Hayle stores, including the extended Lidl and new M&S, has made no difference to the amount of spending retained in Zone 3. In fact the market share of stores has declined from 34% in the PRS to 31.6% in the WYG household survey. This shows there is still an urgent need for a new food store in Hayle.

5.120 The text above and the tables at Appendix 5 set out the full method adopted in the impact assessment. The Morrison's application is for the smallest store which will have a net convenience sales area of 1,486sqm and a turnover of £16.5m in 2014 which has been adopted as the date of impact. It has been assumed that 15% of the

store's turnover will be drawn from the area beyond the primary catchment area that has been taken to be Zones 2,3 and 5. The analysis accounts for all spending drawn from the catchment area and suggests that there will only be minimal impact on the Co-op on Copper Terrace. A trade diversion of £1.06m is estimated. A similar level of impact is estimated on the out of centre Lidl store (£1.06m), however, this is not subject to protection under planning policies.

5.121 The aspiration to increase the market share of Hayle from 34% to 70% requires a site capable of accommodating a modern food superstore. There are no town centre sites that could accommodate such a store. Therefore an edge of centre site is the only practical alternative. The Morrison's store will be located on an edge of centre site and will therefore complement existing shopping provision in Hayle. Within Zone 3 Hayle's market share is estimated to increase from 31% to 68%. Therefore the Morrison's application will more than double the amount of trade retained by Hayle. This significant increase in market share more than off sets the modest impact on the existing Co-op store. The analysis shows that the Morrison's store will secure the uplift in market share proposed by the PRS without there being adverse impact on existing town centre stores (with an allowance for the under recorded turnover of the M&S unit).

5.122 Elsewhere the greater level of trade diversion will come from the ring of out of centre stores that surround Hayle. The greatest level of impact is estimated to fall on the out of centre Tesco at Camborne. Significant impacts are also recorded on the Morrison's and Tesco store in Penzance and the Tesco at St Ives. As the vast majority of these shopping trips are undertaken by car this impact represents a reduction in travel distances and therefore green house emissions. This level of diversion was accepted in the PRS as the appropriate means by which Hayle should become a more self contained shopping destination.

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

5.123 The practice guidance for PPS4 states that this test involves considering whether a proposal is consistent with the role and function of the town centre and its catchment as specified in the network or hierarchy set out within the LDF. Other relevant considerations include the scale of any proposal compared with similar facilities in other centres at a similar level in the hierarchy and a comparison of the proposal itself to similar retail developments in those centres.

5.124 The guidance states that where development plans set out an indication of the scale of new development likely to be appropriate, in those centres, it will be clear whether a proposal is of an appropriate scale. One indicator of the appropriateness of a proposals scale is whether there is a demonstrable need based upon current / forecast expenditure and current market shares. It may also be necessary to consider other issues related to scale such as the accessibility of the proposal to its intended catchment, the effect on overall travel patterns and consistency with the overall planning strategy for the area. Each of these considerations is taken in turn below.

(i) *Consistency with the role and function of the town centre and its catchment*

5.125 Policy EC6 in the adopted RPG encourages a distribution of convenience shopping provision that minimise the length and frequency of trips, so that any settlement of reasonable size has access to all normal day-to-day necessities. The Cornwall Structure Plan (para 87) does not impose a rigid retail hierarchy due to concerns over unnecessarily constraining the ability of centres to adjust to changing opportunities and needs. However, Hayle is identified at paragraph 139 as an 'other main town' such that it should have the capacity to meet the needs of the surrounding area, as well as its own population.

5.126 Structure Plan Policy 14 places priority on the improvement and enhancement of town centres to meet the aspirations of the whole community. Having satisfied the sequential assessment, the proposal therefore accords with the remainder of Policy 14 in that it will help to sustain and enhance the centre's vitality and viability and will be accessible by a choice of means of transfer.

5.127 At the local level, Policy TV-1 states that the majority of development within Penwith will be focused within Penzance, Newlyn, St Ives and Hayle. Furthermore, Policy TV-16 specifies that major retail developments should be located in the town centres of Penzance, St Ives and Hayle, or where they cannot be accommodated in the town centres, they should be located on the edge of those centres.

5.128 The emerging LDF has been described in Section 3. Option CS16 of the Core Strategy aims to maintain and improve the role and function of Penzance, St Ives and Hayle and to increase the retail provision in Hayle in line with the relevant guidance at that time, i.e. PPS6 and the sequential test set out therein.

5.129 Consequentially, Hayle is identified within the planning policy hierarchy as being a town within which an increase in retail provision should be planned for.

*(ii) The scale of the development in comparison with other centres*

5.130 As detailed above, the Structure Plan does not set out a detailed hierarchy, however, Hayle is identified at the local level alongside Penzance as being a location for major new retail development.

5.131 The PRS identifies that the majority of the leakage of main food shopping trips from Hayle and its PCA are to those foodstores identified under Table 10.

5.132 The most leakage is occurring to the Tesco at Wesley Street, Camborne (1,923 sqm net); the Tesco at Bramwell Lane, Penzance (2,265 sqm net); the Tesco Extra at Station Road, Pool/Redruth (5,626 sqm net); and the Morrisons at Long Rock Business Park, Penzance (4,599 sqm net).

5.133 At 1,858 sqm net, the proposed food store at the Jewson site would not therefore be considered out of scale with the existing individual supermarkets within the PCA to which leakage is occurring.

5.134 Furthermore, Penzance and Camborne are identified as Strategic Urban Centres (as set out under Policy 16 of the Structure Plan). The cumulative provision of in-town / edge of town centre major foodstores in Hayle (Morrisons at 1,858 sqm and Co-op at 995 sqm, total 2,853 sq m) would be in keeping with its 'other main town centre' status compared with the larger Strategic Urban Centre's combined provision at Penzance (Tesco and Morrisons, 6,864 sqm) and Camborne/Redruth (Tesco and Tesco Extra 7549 sqm).

5.135 The proposals are therefore considered to be in-scale with the position of Hayle and the other centres within the retail hierarchy.

*(iii) Evidence to support scale proposed*

5.136 The PRS clearly identifies a need for convenience floor space commensurate with within the first five years of the proposed development the level proposed. The conclusion of the PRS is that this should be provided in a single major foodstore to bring about a step change in provision in Hayle. The proposals will therefore achieve

the level of identified retail floor space required in order to meet the recommendations of an up to date retail study.

- 5.137 Therefore, in line with PPS4, there is a demonstrable need based upon current / forecast expenditure and the clawback of current market shares to justify the scale of the proposal.
- 5.138 The turnover assessment set out previously, clearly indicates that the out of town scheme proposed by Sainsbury's would result in the proposal which is out of scale with the need and size of Hayle. Similarly, and on the basis that the Asda proposals are significantly larger than Sainsbury's proposals, the Asda scheme will be even more out of scale with the role and function of Hayle.
- 5.139 The turnover / impact assessment of the ING scheme will also be larger than the proposed food store. The Actoris proposal has been shown to be of the scale required in order to claw back the required amount of expenditure to Hayle from other out of centre locations. The range of goods / product lines to be sold within the proposed store are commensurate with the range currently sold within the Morrisons stores in Pool and Penzance. Therefore, customers currently travelling to Pool and Penzance to undertake their weekly shop from Hayle will have a similar level of choice in order to fulfil the weekly bulk food shop.
- 5.140 Also of relevance when comparing the Actoris scheme to the other supermarket schemes is the relatively low level of comparison floorspace proposed. The 20% of comparison floorspace proposed is considered to be in scale with the function of the supermarket and its need to address the convenience floorspace need within the town.

**(f) Any locally important impacts on centres under Policy EC3.1.E**

- 5.141 There are no defined locally important impacts on centres which should be tested in this instance.

**Summary of EC16.1 Assessments**

- 5.142 The assessment under Policy EC16.1 has demonstrated that the proposal will not have an adverse impact upon proposed or existing investment in identified centres in the catchment area and nor will it have any negative impact upon any other allocated sites outside of town centres. The impact on vitality and viability will be a positive

impact which will outweigh any minimal impact upon the diversion of in-centre trade / turnover. The proposal also satisfies the test with regard to its scale in relation to Hayle's role and its position in the hierarchy of other centres.

5.143 As a consequence, the proposal satisfies the test set out within Policy EC16.1.

**Policy EC17: The consideration of planning applications for development of main town centre uses not in the centre and not in accordance with an up to date development plan**

5.144 Subject to the caveats with regard to the allocation on the site for mixed use including retail, the examination of Policies EC15 and EC16 therefore leads to the conclusion that the requirements of Policy EC17.1 have been met i.e. that it has been demonstrated that the proposals comply with the sequential approach and that there is clear evidence that the proposal will not lead to significant adverse impacts in relation to 16.1.

5.145 The impacts associated with EC10 are dealt with within the other supporting documents to the application and summarised within the planning statement.

5.146 The requirements of Policies EC17.2 and EC17.3 are also covered within the planning statement.

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## 6.0 SUMMARY AND CONCLUSIONS

- 6.1 This PPS4 Impact Assessment has been prepared by Savills on behalf of Actoris in support of a full planning application for a proposed development of a new foodstore on land currently occupied by the Jewson builders merchants at Carnsew Road, Hayle.
- 6.2 It has been prepared in line with the guidance set out within PPS4 and the accompanying good practice guidance. Pre-application consultation has taken place with the LPA in order to agree the scoping for the assessment. It has been informed by the PRS, which is agreed to provide a robust evidence base for established shopping patterns and need within Hayle. The information contained within the PRS has been supplemented by utilising household surveys undertaken as part of the retail impact assessment of the Sainsbury's proposals at Marsh Lane (produced by WYG) and through site visits and studies in order to update the healthchecks.
- 6.3 The proposals will result in a significant enhancement of the conservation area through the demolition of the existing non-listed buildings on-site and the replacement with a sensitive, well-designed new building and associated landscaping.
- 6.4 The Jewson operations are to be relocated prior to the commencement of any redevelopment of the site, thereby securing continuity of operation and jobs within Hayle.
- 6.5 The proposals will assist in bringing about the aspirations set out within the allocation of the site under Proposal TV-D of the Penwith District Local Plan as part of the wider regeneration of Hayle Harbour. The allocation supports mixed use development, including retail, but subject to appropriate tests. This statement has undertaken those tests as part of the updated PPS4 requirements.
- 6.6 The site is in an edge of centre location and has been designed specifically in order to maximise the potential for linked trips to the existing Foundry Town Centre through the location of the car park and the pedestrian links proposed. The site has been demonstrated to be the most suitable, available and viable location for a major foodstore given the constraints of the existing town centre and other edge of centre sites.
- 6.7 The proposal is therefore located in the most appropriate position to act as an important draw to the Hayle town centres, with the resultant benefits associated with

the large increase in the number of shoppers drawn to the area. It is recognised that a very high percentage of the food shopping trade is currently lost from Hayle as the result of the lack of a major supermarket. The proposal will therefore claw back the large amount of trade currently lost from Hayle to the benefit of the town centres. The improvement in the offer of Foundry Town Centre will encourage linked trips to the benefit of existing retailers and to the vitality and viability of the town centre.

- 6.8 In addition to the underlying need for the development, PPS4 sets out 2 key tests with regard to assessing the proposal, which is classed as a 'main town centre use' for the purposes of the assessment. A summary of our conclusions on need and for each of the key tests is set out below.

**Established retail need**

- 6.9 The assessment has been undertaken in line with the agreed position that the PRS is a robust and up to date retail study for the town of Hayle. The conclusions that can be drawn from this have set the background for the PPS4 assessment.
- 6.10 The proposal will meet the identified convenience goods need within Hayle as set out within the PRS. It has been well established that convenience goods shopping provision in Hayle is limited and fails to retain an appropriate level of spending within the town. Our assessment updates the PRS and demonstrates that even within the opening of the M&S store and the Lidl store extension, the market share of stores within Hayle has declined. This demonstrates an urgent need for a new foodstore in Hayle.
- 6.11 The proposal will therefore help to claw back a significant proportion of food shopping trips and expenditure that is currently leaked from Hayle and the PCA.
- 6.12 The PRS identifies that Hayle is in need of a step change in its foodstore provision. It recommends that this is rectified through the development of a single large foodstore. This proposal accords with that recommendation and is of a size that has been calculated to recapture the leaked expenditure from Hayle, thereby significantly reducing the amount of travel to large foodstores in out of centre locations, outside of Hayle.
- 6.13 Consequently, the proposals will meet an identified need for a major foodstore of the size proposed in Hayle.

### **Sequential Assessment**

- 6.14 The sequential assessment carried out under Policy EC15 of PPS4 has demonstrated that there are no sites or premises currently available, suitable or viable within the town centre to accommodate the scale and type of foodstore proposed. Similarly, it has demonstrated that the application site is the most suitable edge of centre site to accommodate a major foodstore proposal. The site is therefore the most sequentially preferable site to accommodate the development required to meet the retail need of Hayle.

### **Impact Assessment**

- 6.15 Section 5 includes the Impact Assessment carried out under Policy EC16 of PPS4. The key tests have been met for the following reasons.
- 6.16 The proposals will not have any negative impact on existing, committed or planned investment within the Hayle Town Centre or other centres within the catchment of the proposal. There are no schemes that would be compromised by the proposals and, in fact, the regenerative benefits of the proposed scheme will have a positive impact upon Hayle Town Centre.
- 6.17 The proposal will have a positive impact upon town centre vitality and viability and will improve local consumer choice through the range and quality of convenience and comparison goods available. The store has been located in the closest and most suitable edge of centre location to the town centre and will bring about increased footfall and improved vitality and viability of the town centre by virtue of the linked trips that the proposal will encourage. The claw back of expenditure from out of centre locations, which is currently lost, will only have a positive impact upon retail vitality and viability. The existing town centres are vital and viable, with low vacancy rates.
- 6.18 The low percentage of comparison goods provided by the proposals mean that the Morrisons scheme is the most appropriate of the supermarkets currently proposed for Hayle. The town centre healthcheck supports this conclusion.
- 6.19 The proposals have been shown not to have any negative impact upon allocated sites outside of the town centre that are being developed in accordance with the Development Plan. The ING proposals for the Hayle Harbour area (as endorsed in March 2009) will not be affected by this proposal due to the different character and

nature of the retail floorspace proposed. The proposals are considered to complement the long term proposals for the wider regeneration of the harbour area, given that this is the most appropriate site for a large scale foodstore within the TV-D proposal.

- 6.20 The impact of the proposal on the in-centre trade / turnover and on trade in the wider area has been demonstrated to be acceptable. The proposal is calculated to radically improve Hayle's market share from the current 31% to an estimated 68%. The greatest level of trade diversion will come from the ring of out of centre stores that surround Hayle. As the vast majority of the shopping trips are undertaken by car at present this impact will result in a reduction in travel distances and therefore greenhouse emissions.
- 6.21 This level of trade diversion is accepted in the PRS as the most appropriate means by which Hayle should become a more self-contained shopping destination. The trade diversion from the Co-op on Copper Terrace is more than off-set by the benefits of the claw back of expenditure predicted.
- 6.22 The proposal has also been demonstrated to be of an appropriate scale for Hayle given the size of the centre and its position in the hierarchy of other centres within Cornwall. The scale of the proposals represents the most appropriate fit compared with the identified retail need set out within the PRS in order to produce the step change required in shopping provision within Hayle.
- 6.23 The March 2010 GVA Grimley report for Cornwall Council raises significant concerns over the Sainsbury's out of town proposal at Marsh Lane in terms of its negative impact on turnover levels in Hayle centres and its overall impact upon the vitality and viability of the town centre.
- 6.24 Significant concerns were also raised by GVA Grimley in relation to the ING proposals on South Quay and its impact upon the performance of the town centres in Hayle. Given its financial impact upon the performance of the town centres and the scale of the development proposed, the GVA Grimley report goes on to conclude that they consider that a smaller store than the ING proposals would be able to offer benefits in terms of consumer choice, retail offer and accessibility but reduce the severity of the negative impacts likely to arise from such a large scale proposal. The ING proposals were for a 3,159 sq m net floorspace store compared with the 1,858 sq m net proposals on the Jewson site. The proposal on the Jewson site is therefore considered to comply with the recommendations of the GVA Grimley report by

providing a smaller store with a demonstrably lower impact upon the town centres of Hayle compared with the recently withdrawn ING proposals.

- 6.25 It has been demonstrated that other proposals for super markets within Hayle would be out of scale and therefore have significantly greater impacts upon the vitality and viability of the town centre. The Jewson site proposal therefore represents a scheme of the most appropriate scale of the various supermarket proposals in Hayle.

#### **Other considerations**

- 6.26 The accessibility of the site is examined in detail within the Transport Assessment and ES accompanying the application. The accessibility of the application site will encourage non-car borne trips by virtue of the site's proximity to the existing public transport routes, cycle and pedestrian facilities. The high percentage of main food trips by the residents of Hayle are currently car borne to out of centre locations outside of Hayle. The recapturing of those trips will result in a significant reduction in carbon emissions and will encourage those trips to be replaced by non-car borne trips due to the site's location.
- 6.27 The accompanying planning statement goes in detail into the other material considerations in favour of the proposals. However, there are positive benefits to be gained through the proposals in respect of the heritage setting of the site. The high quality development proposed will improve the attractiveness of the site and have spin-off benefits for the town centre.
- 6.28 There are significant job creation benefits associated with the proposal, with the added benefit of the retention of the Jewson operation within Hayle and the jobs and economic benefits associated with it. The socio-economic chapter of the ES which accompanies this statement considers the social-economic impacts in detail.

#### **Conclusions**

- 6.29 To conclude, the proposed development represents an opportunity to bring about the redevelopment of a brownfield site on the edge of Hayle Town Centre. The proposal will meet the identified need for a step change in shopping provision in Hayle by virtue of providing an opportunity for the claw back of the significantly detrimental leakage of expenditure from Hayle at present, and in the form of a single foodstore as endorsed by the PRS.

- 6.30 The proposals will satisfy the scale of development required in a manner which will benefit the vitality and viability of the existing town centre and bring about significant regeneration benefits. The improvement in consumer choice is predicted to change the shopping patterns in Hayle to the benefit of sustainability principles by significantly reducing car borne trips to out of centre locations.
- 6.31 The proposal has been demonstrated to meet the planning policy tests set out by national, regional and local policy in retail terms and will bring about significant positive benefits for the town of Hayle. We conclude, therefore, that this statement has demonstrated that the proposal satisfies the relevant retail policies.

**APPENDIX 1**

**Scoping Correspondence**

**APPENDIX 2**

**Catchment Area Zones Plan from Penwith Retail Study December 2007**

**APPENDIX 3**

**Sequential Assessment Sites**

**APPENDIX 4**

**Town Centre Health Check Data**

**APPENDIX 5**

**Impact Assessment Tables**