

ACTORIS LTD

JEWSON SITE, CARNSEW ROAD, HAYLE

PLANNING STATEMENT

FULL APPLICATION FOR THE DEMOLITION OF THE 20TH 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

LISTED BUILDING CONSENT FOR WORKS TO THE FORMER HARVEYS TIMBER SHED GRADE II LISTED BUILDING TO INCLUDE THE REMOVAL OF THE ASBESTOS ROOF SHEETING AND REPLACEMENT WITH NEW WELSH SLATE ROOF, REMOVAL OF MODERN RACKING AND CONSERVATORY EXTENSION, REPOINTING, REINSTATEMENT OF GRANITE PILLARS AND TIMBER BOARDING, LIMEWASHING AND RESURFACING OF HARD STANDING TO PROVIDE NEW CAR PARKING SPACES AND SPRINKLER STORAGE TANK IN ASSOCIATION WITH A PROPOSED FOODSTORE DEVELOPMENT OF THE SITE AT THE JEWSON SITE, CARNSEW ROAD, HAYLE.

April 2010



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1.0 INTRODUCTION

- 1.1 This report has been prepared in support of a full planning application and listed building consent application submitted on behalf of Actoris Ltd for the redevelopment of the Jewson site, Carnsew Road, Hayle. These applications seek the demolition of the 20th century buildings associated with the Jewson operation, the construction of a 3,455 sq m (Gross External Area) Class A1 retail foodstore, formation of associated 227 car parking spaces, new vehicular accesses from Carnsew Road to service the car park and service yard area and associated works to and within the listed building.
- 1.2 This planning statement supports both the full planning application and the associated listed building application for the refurbishment of the listed timber shed fronting Carnsew Road.
- 1.3 The existing Jewson premises / business operation is to be relocated within Hayle in conjunction with redevelopment of the site subject to appropriate planning permissions being obtained.
- 1.4 The proposals are described as follows:

Full planning application

Full application for the demolition of the 20th 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

Listed building application

Listed building consent for works to the former Harveys timber shed Grade II listed building to include the removal of the asbestos roof sheeting and replacement with new welsh slate roof, removal of modern racking and conservatory extension, repointing, reinstatement of granite pillars and timber boarding, limewashing and resurfacing of hard standing to provide new car parking spaces and sprinkler storage tank in association with a proposed foodstore development of the site at the Jewson site, Carnsew Road, Hayle.

1.5 This document sets out the justification in planning terms for the proposed development, taking into account the range of recognised issues, and in particular relating to:

- § the principle of development;
- § retail issues;
- § heritage considerations including: the need to address the site's World Heritage designation and the need to preserve and enhance the character of the conservation area and the listed building within the site, in addition to the need to address the setting of surrounding listed buildings and the archaeological value of the site and surrounds;
- § the natural environment;
- § sustainability;
- § design;
- § flood risk;
- § accessibility and transportation; and
- § other material considerations, including economic regeneration and job creation and residential amenity

1.6 This planning statement should be read in association with the suite of documents that support the application as follows:

- § Environmental Statement (ES);
- § Design and Access Statement;
- § Heritage Statement;
- § PPS4 Impact Assessment;
- § Transport Assessment and Travel Plan;
- § Statement of Community Involvement;
- § Engineering Design Statement;
- § Archaeological Assessment (ES Technical Appendix 7);
- § Flood Risk Assessment (ES Technical Appendix 11); and
- § Desktop Contaminated Land Study (ES Technical Appendix 12).

1.7 This planning statement will provide a summary of the supporting documents described above and, where appropriate, will draw conclusions from those reports in respect of the planning policies pertinent to those particular issues and to the proposed development.

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- 1.8 This statement describes the proposals, sets them in context with the site and its surroundings, and examines how the proposals respond, and comply with, the planning policy context.
- 1.9 The statement goes on to provide conclusions on the benefits that will arise from the development proposed.
- 1.10 This statement is structured as follows:
- § Section 2: The application site - provides a description of the characteristics of the site and surrounding area, including providing context for the proposals in respect of concurrent proposals for supermarket development in Hayle at the present time;
 - § Section 3: Planning History - provides brief details with regard to the planning history to the application site and to sites within its immediate context;
 - § Section 4: Development Proposal - provides full details of the development proposed;
 - § Section 5: Planning Policy Context - sets out the relevant planning policy framework;
 - § Section 6: Key Planning Considerations - analyses the key planning considerations arising from the proposed development within the planning policy context, and draws together the findings of the various supplementary documents;
 - § Section 7: Summary and Conclusions - sets out our summary and conclusions on the proposal.
- 1.11 The appendices referred to in the text are enclosed at the end of the report.

2.0 THE APPLICATION SITE

- 2.1 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.
- 2.2 The site extends to an area of 1.63ha, which includes the highways land required for the formation of the new entrance roundabout.
- 2.3 The site can be described as previously developed land, given the existing buildings sited thereon, and the long history of development on the site in relation to the Harveys Foundry operations associated with Hayle and the Harbour area. The builders merchants is operational.
- 2.4 The site is located to the north of Carnsew Road at its junction with Foundry Lane. It is within the urban area of Hayle, being approximately 150 metres from the identified Foundry town centre. The site is bounded to the north by the listed South Quay wall. To the north and the east lie the South Quay and the South Quay Wharf respectively.
- 2.5 Further to the north east and west lies the Hayle Estuary, which includes the Carrack Gladden SSSI. Residential development lies further to the west of the site at Carnsew Meadow.
- 2.6 To the east Penpol Terrace and Foundry Square form the Foundry town centre. Other uses in the surrounding area include the Foundry Lane car park, Booker Cash and Carry, and other commercial uses based around the Foundry Yard and Foundry Square.
- 2.7 The site includes a Grade II listed building, the original function of which was as a timber drying shed in association with the Harveys Foundry. The building is currently used for the open storage of building materials as part of the Jewson operation. Detailed consideration of the listed building and evaluation of the works proposed to it are contained within the supporting Design and Access Statement (DAS) and Heritage Statement, which should be read together as they form the key documents in relation to the listed building application.

- 2.8 The site also includes functional buildings constructed in the late 20th century which house the Jewson offices, customer service areas and storage areas. The site also includes open storage facilities and structures.
- 2.9 Aside from the Grade II listed building, the remaining buildings on the application site are not considered to be of any architectural merit and, in fact, are considered to have a negative impact upon the character of the conservation area and the listed structures within it.
- 2.10 The site lies adjacent to South Quay, which is one of the three quays which make up Hayle Harbour. South Quay has been subject to a number of applications as part of a wider Hayle Harbour regeneration proposal. This is discussed in greater detail in the following sections where it is considered relevant to the current proposals.

Statutory Designations

- 2.11 The site is located within the wider area that makes up the Cornwall and West Devon Mining Landscape World Heritage Site. It also lies within the Hayle Conservation Area.
- 2.12 The Hayle Estuary is subject to a number of nature conservation designations owing to the valued feeding and roosting site for populations of shore birds and water fowl. The Estuary area is part of a SSSI and is also within an Area of Greater Scientific Interest. The ecological context of the site is described and evaluated in detail within the ES that accompanies the application.
- 2.13 The site is subject to a site-specific allocation for mixed use development within the adopted Penwith District Local Plan. This is described in detail within the Planning Policy section.
- 2.14 The accompanying Design and Access Statement provides a detailed assessment of the site and its surrounding context, however, based on the designations affecting the site it can be concluded that there are a number of key factors which need to be considered in the assessment of the application, not least:

- § the ecological context; and
- § the heritage context (including Listed Building settings, Conservation Area status and World Heritage Site Status).

2.15 These are considered in detail alongside other factors and material considerations such as retail issues, accessibility and transportation etc in the later sections of this statement

3.0 PLANNING HISTORY

Preface

3.1 This section sets out the planning history of the application site. Furthermore, an overview of the planning history of the South Quay masterplan and other supermarket proposals in Hayle, which are relevant to this application, are provided in this section.

Site Specific History

3.2 The site has a limited planning history, although it has had a long history of development in association with the former Harveys Foundry. The most recent planning history is outlined in the table below:

Table 3.1: Planning History

Application Ref	Proposal	Decision	Date
00/P/0436	Redevelopment (Outline)	Withdrawn	Unknown
98/P/0390	Redevelopment (Outline)	Withdrawn	4/8/99
85/1174	Storage building for liquid petroleum gas	Withdrawn	Unknown
85/1175	Change of use of building to plant and tool hire branch	Approval	13/1/86

Other significant / relevant planning history

South Quay

3.3 The adjacent South Quay site has been subject to a number of planning applications and proposals within the last 10 years. It has a long history of development proposals that have not been implemented, and has most recently been subject to an outline planning application for a foodstore and a number of Class A1 and Class A3 units. These most recent proposals included car parking, new vehicular access and the raising of the site levels. The application (reference 09-1334-ORM), following a significant number of objections from the public and statutory consultees, was withdrawn in March 2010. The application was made on behalf of ING RED UK (Hayle Harbour) Limited.

3.4 The site has also been part of wider proposals for the Hayle Harbour, also submitted by ING in April 2008. An outline application (reference 08-0613-P) proposed residential, retail, offices, industrial space, leisure and hotel use, together with

associated infrastructure and car parking. A parallel application was submitted for infrastructure improvements (09-1721). This included a new bridge, road, business park, fishing harbour, flood defence works and repair of the harbour walls and sluices.

- 3.5 The South Quay element of the proposals included approximately 260 residential units, 10,000 sqm of retail floor space, 5,000 sqm of office space and 2,000 sqm of leisure development.
- 3.6 The LPA resolved to grant permission for both of the applications subject to a Section 106 Agreement in March 2009. To date, the Section 106 has not been signed but it has been indicated by ING RED that the preferred proposal for the South Quay site is formed by the most recent, albeit withdrawn, outline application for a new foodstore.
- 3.7 Prior to the 2008 proposals, two applications were submitted for the redevelopment of the harbour area to include retail, leisure, industrial, residential and business uses. The application under reference 98/P/0390 was withdrawn. No decision was ever made on the second application under reference 00/P/0436.

Other significant concurrent retail proposals in Hayle

- 3.8 Aside from the proposals by Actoris and ING RED, Hayle is also subject to interest from Sainsbury's and Asda supermarkets, both of which are proposing new foodstores in out of town locations.
- 3.9 Sainsbury's have recently withdrawn a full planning application for an out of centre site at Marsh Lane, Hayle.
- 3.10 Asda have undertaken a public consultation and have proposals for an out of centre supermarket at the Hayle Rugby Club site adjacent to the West Cornwall Shopping Centre. A summary of each of the four competing proposals is set out in the table below.

Table 3.2 - Other Foodstore Proposals for Hayle

Proposal	Size		Food / Non Food Split		Location
	Gross	Net	Convenience sq m	Comparison sq m	
Actoris (Morrisons)	3,331 sq m / 35,850 sq ft	1,858 sq m / 20,000 sq ft	1486 (80%)	372	Edge of Centre
ING	6,864 sq m / 73,885 sq ft	3,159 sq m / 34,000 sq ft	1895 (65%)	1264	Edge of Centre
Sainsbury's	5,222 sq m / 56,210 sq ft	3,042 sq m / 32,744 sq ft	2129 (70%)	913	Out of Centre
Asda	4,347 sq m / 46,800 sq ft ¹	3,345 sq m / 36,000 sq ft	Unknown	Unknown	Out of Centre

3.11 This statement goes on to examine the merits of the Actoris proposals, and identifies the reasons as to why they are the most appropriate for Hayle compared to the other proposals.

¹ Assumes a 70% gross to net ratio based on a 36,000 sq ft net (in accordance with press releases)

4.0 DEVELOPMENT PROPOSAL

4.1 The application is a full planning application for a new foodstore and associated works, to include a new car parking area and new accesses from Carnsew Road.

4.2 The existing Jewson operation is to be relocated to a new site within Hayle. Actoris have given an undertaking to relocate the Jewson operation in order to ensure continuity of their operation within Hayle and, to ensure that the employment benefits of Jewson are retained within the local area.

4.3 Several sites are currently being assessed for the relocation. Planning applications will be submitted in due course once the preferred site has been selected.

4.4 In terms of redevelopment proposals the description of works can be broken down as follows:

Demolition

4.5 The 20th century buildings on the site are to be demolished and the site cleared to make way for the supermarket development. A demolition plan is enclosed at Appendix 1 including those structures to be removed and confirming the retention of the listed building occupying the site.

Proposed use and amount of development

4.6 The scheme comprises a 3,355 sq m (36,115 sq ft) Gross Internal Area (GIA) foodstore (Class A1), 227 car parking spaces and the re-use of the listed building for car parking, cycle parking, motorbike parking and the positioning of a sprinkler water storage tank.

4.7 The proposed operator for the foodstore is Morrisons Plc.

4.8 The areas are described in the following table:

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	1,486 (80%)	372 (20%)

Proposed buildings / layout

4.9 A full description of the buildings and the design philosophy are set out within the Design and Access Statement, along with justification for the design and layout. In summary, the retail floor space is to be accommodated within a single building to be located along the north / north western boundary of the site. The proposed building is to be orientated so that it addresses the frontage to Carnsew Road and the relationship of the site to locations to the east including South Quay and Penpol Terrace beyond it.

4.10 The car parking area has been devised in order to locate car parking in the most convenient location to encourage shoppers using the proposed foodstore to also be able to access Foundry town centre by foot as part of linked shopping trips.

4.11 The building itself will be a bespoke single storey structure designed to reflect the industrial heritage of the site and the surrounding area.

4.12 The pallet of materials chosen for the supermarket include a slate roof, glazing and timber panelling. Again, this has been chosen in order to reflect the industrial heritage of the site.

4.13 The multi-pitched roof design has been devised in order to create a design and scale of the building which is reflective of the historic industrial context of the site. This is described further in detail within the Design and Access Statement and the Heritage Statement accompanying the application.

Listed Building Proposals

4.14 The Grade II listed timber shed is significant given that it is the last remaining structure standing within the former Harveys Foundry site. As such, it is to be

renovated and re-roofed. The 20th century conservatory added to the eastern end of the building is to be removed, and the gable wall infilled with timber panelling. The racking structures utilised by Jewson are also to be removed from the building. The corrugated asbestos sheeting roof is to be replaced with a sympathetic slate and clay ridge tile roof.

- 4.15 The walls are to be repointed and lime washed (as per the original building).
- 4.16 The granite pillars will be retained and missing pillars will be reinstated. The building will be left open, as per its original use as a timber drying shed. The hardstanding within the building is to be resurfaced to allow car parking, cycle parking and the installation of sprinkler storage tank.
- 4.17 A schedule of all materials proposed, in relation to the foodstore and the listed building, is contained in Appendix 2.

Access Arrangements

- 4.18 The existing operation is served by a T-junction onto Carnsew Road. The proposal is to construct a new 4-arm roundabout on Carnsew Road to serve the site, and to provide a revised access to Foundry Lane to the south.
- 4.19 A second, service access is proposed via a T-junction onto Carnsew Road. This will be limited to service vehicles only to serve the rear service yard area.
- 4.20 The proposed foodstore will be accessed by pedestrians from the existing footpath along Carnsew Road. A new pedestrian access is to be provided from Carnsew Road, across the car park, to the entrance of the foodstore – which is inclusive of a pedestrian crossing at the vehicular entrance to the car park.
- 4.21 It is proposed that the Public Right of Way (PRoW) 'footpath 102/16' is to be diverted. PRoW 'footpath 102/43' will remain unchanged. An electronic copy of the Definitive Map depicting the route of these existing PRoW's is attached within Appendix 3.

Landscaping proposals

- 4.22 Corscadden Associates have been commissioned to prepare drawings of the existing landscape features of the wider area surrounding the site (reference 9:01) and

existing landscape features of the site and immediate proximity of the site (reference 9:02).

- 4.23 By virtue of the existing use of, and operations on the site, it currently possesses little value in terms of visual impact. The northern, eastern and western boundary of the site currently consists of a combination of chainlink and palisade fencing and associated bramble, buddleia, ivy and scrub growth. This currently provides a reasonable (albeit informal) screen to the site. In terms of vegetation, the site itself only contains two trees on the frontage and the scrub areas on its boundaries. A colony of a protected plant species, Petalwort, is close to the northwest corner of the site, but outside of the demise of this application.
- 4.24 The proposed landscape design has three different proposed planting types:
- a) native ecological planting to the west and northern boundary
 - b) mixed ornamental and native planting on the east boundary of South Quay
 - c) south and internal planting reflecting the grass and tree planting of the Plantation using Scots Pine as the dominant tree species
- 4.25 The landscape scheme, design and specification has been formulated in close liaison with the ecologist and architect, in addition to Cornwall Council officers on the general design approach.

Scope of the application

- 4.26 The proposals have been subject to extensive statutory and non-statutory pre-application consultation, extensive survey work and rigorous information gathering. This has enabled a high quality and informed design solution for the proposed foodstore that reflects, balances, and optimises the views of technical bodies as well as heritage bodies.
- 4.27 Pre-application discussions have been held with a significant number of parties, including (but not limited to) officers of Cornwall Council, the Environment Agency, the RSPB, English Heritage and Natural England.
- 4.28 Local consultation has also been undertaken with the Town Council and with other local bodies such as the Chamber of Trade. Furthermore, the proposals were publicly displayed at a public consultation event.

Environmental Impact Assessment (EIA)

- 4.29 As a result of this thorough detailed pre-application consultation, a request for a Screening Opinion for an Environmental Impact Assessment (EIA) has not been submitted to Cornwall Council. Rather, an EIA is submitted 'voluntarily' by the developer for the purposes of the EIA Regulations, and as such, this application must be treated as an EIA application by the LPA.
- 4.30 In summary, because the proposal is considered to be within a sensitive location (given its SSSI context and WHS location), a unilateral decision has been taken to produce an ES.
- 4.31 In formulating a view on the need for EIA, the proposal was not considered to be of such a scale to be a major development of more than local importance, and was not considered to be development with particularly complex and potentially hazardous effects (due to the fact that it is a brownfield site which is currently in use as a builders merchants). Rather, it is the site context, as opposed to the scale and nature of the proposed development, which warrants an EIA.
- 4.32 Given the 'voluntary' initiation of an EIA to accompany the application no formal request for the Council's scoping opinion has been sought to proceed the preparation of this ES.
- 4.33 Notwithstanding this, extensive dialogue and consultation with the Council and Statutory Consultees has been undertaken to inform the subject areas needing assessment and evaluation as part of this planning application process. This consultation has therefore been used to help scope the EIA. Where relevant, further guidance has been sought from the relevant statutory consultees as to the approach to be adopted within the specialist topic areas of the ES, as well as the specific methodologies to be adopted within the assessment. This has ensured that the EIA and other supporting assessment documentation accompanying this application are robust and comprehensive.

5.0 PLANNING POLICY CONTEXT

Preface

- 5.1 This section sets out the relevant planning policy framework for the site and surrounding area, having regard to the development proposed. It identifies the relevant planning policy context from the strategic to local level, including National Planning Policy, Regional Policy and the adopted Local Plan – in addition to emerging planning policy. Consideration of the key policies have been arranged in to key topic headings in order to consider the issues arising from the proposal.
- 5.2 Further, more detailed and specific commentary / evaluation of planning policy, is also accounted for in other supporting documents which accompany the application – with which this section should be read in conjunction.

Development Plan Context

- 5.3 The site lies within the boundary of Cornwall Council. The current Statutory Development Plan for the area comprises of the following documents:
- § Regional Planning Guidance for the South West (RPG 10) (September 2001)
 - § Saved policies from the Cornwall Structure Plan (September 2004)
 - § Saved policies from the Penwith Local Plan (February 2004)
- 5.4 Cornwall Council was formed in April 2009 following a structural change to the local government system which created this new Unitary Authority. The new authority is an amalgamation of the six existing district and borough councils (i.e. Carrick, Kerrier, Restormel, Caradon, Penwith and North Cornwall), as well as Cornwall County Council - effectively creating one streamlined council. The site lies within the former Penwith District Council.

Planning Policy Considerations

- 5.5 The principal planning policy context for the scheme comprises of a suite of national, regional and local level policies, as set out below.

National

5.6 The following policies, as published by the UK Government are considered as part of this application:

- § Planning Policy Statement 1: Sustainable Development (PPS1) (2005)
- § Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) (2009)
- § Planning Policy Statement 5: Planning for the Historic Environment (2010)
- § Planning Policy Statement 9: Biodiversity and Geo-Conservation (PPS9) (2005)
- § Planning Policy Guidance 13: Transport (2001)
- § Planning Policy Statement 25: Development and Flood Risk (2006)

Regional

5.7 In addition, regard is had to policies published at a regional level. RPG 10 and the saved policies from the Cornwall Structure Plan will be replaced by the Regional Spatial Strategy for the South West (RSS). As such, the following policies are considered as part of this application:

- § Regional Planning Guidance for the South West (RPG 10) (2001)²
- § Saved policies from the Cornwall Structure Plan (2004)³
- § South West RSS (emerging)⁴

² The Regional Planning Guidance for the South West (RPG10) was approved in September 2001 and sets out a broad development strategy for the period to 2016 and beyond.

³ The Cornwall Structure Plan was adopted in September 2004. It continues to be a statutory planning document for Cornwall and all of the policies have been saved.

⁴ The RSS is in the process of being prepared and in July 2008, the Secretary of State published the Proposed Changes to the RSS. However, its final publication has been delayed as further sustainability appraisal work on the Proposed Changes is required. The outcome of which is expected in early 2010. When adopted, the RSS will provide a framework for development and investment in the region over the next 15 – 20 years. In the meantime, it remains a material consideration to be taken into account when assessing an application.

Local (Cornwall Council / Former Penwith District Council)

5.8 At a local level, the saved policies from the Penwith Local Plan will, in time, be replaced by the Cornwall Local Development Framework (LDF) – which are at the early stages of preparation. Prior to the formulation of Cornwall Unitary Authority, Penwith District Council were in the process of preparing various policy documents (the Core Strategy and Hayle Area Action Plan) – which has since been held in abeyance. Nonetheless they remain a material consideration as they will inform the work being carried forward for Cornwall's LDF. Accordingly, the following local planning policy is considered:

- § Saved policies from the Penwith Local Plan (Adopted February 2004)
- § Draft Hayle Area Action Plan (AAP) (February 2008)

5.9 An overview of the principal planning considerations, in so far as they relate to the issues of importance which arise with the scheme, is provided in this section. These are considered to be:

- § The principle of development and sustainable development
- § Retail and economic development
- § The Historic Environment
- § The Natural Environment
- § Design
- § Transportation and Accessibility

5.10 A detailed assessment of the acceptability of the application against the relevant planning policy context is set out in Section 6 of this statement.

Principle of Development and Sustainable Development

Preface

5.11 Planning ought to facilitate and promote sustainable patterns of development, and it therefore plays a key role in delivering the Government's sustainable development objectives. Accordingly, there is a direct relationship between establishing the principle of development is acceptable, and delivering sustainable development. Therefore, these two, wider concepts are considered together below.

National - Planning Policy Statement 1: Sustainable Development (2005)

- 5.12 PPS1 relates to 'Delivering Sustainable Development' and sets out the Government's overarching planning policies for the delivery of sustainable development.
- 5.13 Notably, PPS1 promotes the efficient use of land through higher density, mixed-use development and the use of suitably located previously developed land and buildings. PPS1 emphasises that planning should seek to actively bring vacant, and underused, previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land.
- 5.14 With specific reference to the delivery of sustainable economic development, planning authorities are encouraged to, amongst other things:
- § recognise that economic development can deliver environmental and social benefits;
 - § ensure that suitable locations are available for industrial, commercial, retail, tourism and leisure development;
 - § provide for improved productivity, choice and competition;
 - § recognise that all local economies are subject to change; and
 - § actively promote and facilitate good quality development.

Regional - Regional Planning Guidance 10

- 5.15 Policy SS 18 sets out the specific aspirations for Cornwall and the Isles of Scilly. This refers to the regeneration of the main towns to act as employment and service centres for their population and rural hinterlands. Furthermore, policy SS18 aims to conserve and enhance the distinctiveness of the natural and historic environment within this sub-region.
- 5.16 Policy VIS 2 sets out the principles for future development in the region. It states that Local Authorities should:
- § Seek the development of suitable previously developed urban land and other appropriate sites in urban areas as a first priority for urban-related land uses;
 - § Critically examine the potential of urban areas to accommodate new development;

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- § Seek a balance of land uses in urban localities:
 - § Promote mixed-use development and, where sites are smaller, through complementary land allocations over a wider urban area;
 - § Include a mix of housing types, retail, business and commercial development, industry, education, social and cultural facilities, leisure, sport, recreation and open space uses;
 - § Ensure that land is used efficiently in both urban and rural locations, with well designed development taking place;
 - § Make adequate provision for all land uses;
 - § Meet the economic and social needs of rural communities;
 - § Promote the provision and enhancement of networks for walking, cycling and public transport;
 - § Conserve and enhance environmental assets and promote a good quality design, including good building design, quality landscape and urban spaces and a mixture of complementary uses; and
 - § Reduce and minimise flood risk.
- 5.17 The RPG identifies 11 Principal Urban Areas (PUAs) where the majority of development ought to be accommodated. Hayle is not identified as a PUA, however, outside of the PUAs, the role of other appropriate market towns and key villages in rural and coastal locations is recognised as the places where development will be favoured locally.
- 5.18 This strategic, spatial distribution of development is reflected in Policy SS21 'Coastal Areas'. Policy SS 21 states that coastal towns should be the focal points for development and service provision and this role should be supported and enhanced. Policy SS21 advises that, amongst other objectives, local authorities, in their development plans should adopt policies which support the restructuring of the coastal economies and the provision of jobs to satisfy local needs and to seek ways of providing for essential shops and services to serve the coastal areas.

- 5.19 On a more localised scale and in relation to quality of the built environment, Policy EN 4 insists that, through collaborative working with developers and other agencies, local authorities should aspire to make urban places where people wish to live. It seeks to bring forward previously developed brownfield sites to enable urban restructuring and redevelopment. It also requires high quality architecture, urban design, layout and landscape architecture in all new development.

Regional - Cornwall Structure Plan

- 5.20 Saved Policy 1 of the Cornwall Structure Plan sets out the key principles for sustainable development against which development will need to be assessed. It states that development should be compatible with:

- § The conservation and enhancement of Cornwall's character and distinctiveness;
- § The prudent use of resources and the conservation of natural and historic assets;
- § The regeneration of towns and villages in meeting the needs of their population and surrounding area;
- § Fostering the links between the environment and the economy;
- § A reduction in the need to travel;
- § Access for all sectors of the community to well paid and rewarding employment, satisfactory housing and adequate services and facilities; and
- § Meeting needs where they arise.

- 5.21 Saved Policy 3 relates to the use of resources and confirms that development should give priority to the re-use of previously developed land to meet development needs. Furthermore it encourages that land at risk from flooding should be avoided (and by following a sequential approach to give priority to low risk areas), sustainable urban drainage techniques are used, pollution is avoided, energy conservation is facilitated and sustainable construction principles should be applied.

- 5.22 Saved Policy 16 relates to the overall distribution of development in Cornwall. It states that development should be in, or well integrated with, the existing built up areas of towns, in accordance with their role and function, and should not harm their character. A number of Strategic Urban Centres are identified, whereby development should be focused. In relation to other main towns and local centres, it is stated that their role and function should be supported in order to meet the needs of their relative populations and surrounding areas.
- 5.23 Further detail is provided in Policy 25 which relates specifically to the role and function of 'other main towns and local centres' and the importance that they are able to meet the needs of their own populations and surrounding areas to reduce the need to travel. The level of development in such towns and centres will be assessed against their ability to consolidate their roles and functions, and to support balanced growth in jobs, services and transport infrastructure. In relation to employment provision, there should be a focus on the needs of the local area and on opportunities relating to local characteristics and distinctiveness.

Emerging Regional Planning Policy - Draft RSS

- 5.24 The draft RSS adopts a similar tone to RPG10 in terms of the strategic location of development and the identification of Strategically Significant Cities and Towns (SSCTs) – as the focus of development. Outside of the SSCTs, the RSS seeks smaller scale change which achieves more self contained, balanced communities and a better local environment. Furthermore, the level of provision of housing, employment, shopping and other services ought to be aligned to support the role and function of each market and coastal town – in order to increase their self-containment and enhance their roles as service centres.

Local - Penwith District Local Plan

- 5.25 The Penwith Local Plan does not identify a settlement boundary for Hayle. Policy GD-1 however requires that development is integrated with its surroundings in terms of its scale, siting and design and be in keeping with the character of the District.
- 5.26 Policy TV-1 states that development will be focused on the towns of Penzance, Newlyn, St. Ives, including Carbis Bay, and Hayle and, to a lesser extent, the main villages listed. As per the thrust of national and regional policy, it states that proposals should maximise the use of brownfield land. Proposals for development in or on the edge of a settlement should be well integrated into the form of the

settlement, and be of a scale and design which is in keeping with the character of the settlement.

5.27 The Quays in Hayle are identified as important features and the Local Plan states that the redevelopment of these areas is crucial to the revitalisation of the harbour and the town.

5.28 As such, Policy TV-D specifically allocates South Quay/Foundry Yard (6 hectares), North Quay (7.9 hectares) and East Quay (1 hectare) as an area suitable for mixed use development. This policy sets out a number of criteria relating to the totality of this allocation. Relative to this application, it is necessary to draw attention to the following criteria for development at this location:

- § Ensure that town centre uses are closely integrated with the adjacent town centre in terms of location, orientation and pedestrian movement;
- § Be of a scale and design that respects the maritime environment and heritage of these prominent locations in the harbour;
- § Retain existing buildings and traditional features which contribute to the character of the area;
- § Be compatible with their surroundings; and
- § Include provision for the improvement of the junction between Carnsew Road and Foundry Lane.

5.29 The justification text for this policy provides further, site-specific detail regarding the principle of redevelopment of the Hayle. The application site falls within the 'South Quay / Foundry Yard' part of the allocation.

5.30 The Council recognises the need for the regeneration of the harbour area, and the delays and setbacks which the redevelopment of Hayle has been subject to. As such, the Council has adopted a positive attitude to development proposals in the harbour area – providing that the development does not result in any environmental trade offs.

5.31 Paragraph 7.3.109 of the supporting text defines the extent of 'South Quay'. It states:

“South Quay extends northwards from the railway viaduct and the areas occupied by Jewsons and adjacent buildings are included within the potential redevelopment are together with the area of the former foundry yard to the south of the B3301....This area has the benefit of good access to the main road network without the need for traffic to pass through the town.”

5.32 South Quay (and the other allocated areas) will be acceptable for a range of uses, including retail. The supporting text in Paragraph 7.3.115, states that any retail element on this site should endeavour to strengthen the role of the two centres in Hayle – Foundry and Copperhouse.

5.33 It also states that:

“In the interest of safeguarding the vitality and viability of these centres, retail uses within the scheme should be complementary and, in the case of the Foundry centre, be well integrated both physically and visually. Developers will also be required to undertake a ‘needs assessment’ if a proposal is made for any substantial retail, leisure or other town centre type development”.

Emerging Local Planning Policy - Penwith Local Development Framework (LDF)

5.34 The Penwith Local Plan has now been superseded by the Cornwall LDF. Nonetheless, the Hayle Area Action Plan – Issues and Options Paper is considered a material consideration in the determination of this planning application.

5.35 In relation to the harbour area, this document confirms that the Council appreciate the fact that Hayle Harbour is one of the largest previously-developed (brownfield) sites in the region and presents a unique opportunity to help catalyse the regeneration of Hayle. In order to direct future development to sites within the existing built-up area of Hayle, a development boundary is set out on the draft proposals map. The application site is located within this proposed development boundary.

5.36 As per the Local Plan, the application site falls within the ‘South Quay / Foundry Yard’ part of the allocation of Hayle Harbour (Site H1) for redevelopment of a mix of residential, employment, shopping and leisure uses.

Summary

- 5.37 As informed by national and regional level planning policy, there is a preference for development on previously developed land – in order to deliver sustainable development. This policy direction is interpreted in local level planning policy which encourages coastal town regeneration – in circumstances such as Hayle Harbour. Given the application sites status as previously developed site, its location within the existing built up area and mixed use allocation (to include retail uses), the principle of development at the application site is well established.

Retail and Economic Development

Preface

- 5.38 This section reviews the national, regional and local planning policy relevant to retail and economic development.

National - Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) (2009)

- 5.39 Compared to the now superseded PPS6, PPS4 no longer requires a needs test at application stage. Rather, the five tests in PPS6 are replaced by two – the sequential approach and the ‘new’ impact test. PPS4 is accompanied by a Practice Guide – Planning for town centres.
- 5.40 Policy EC14 sets out the requirements for supporting evidence for planning applications for main town centre uses. With regard to the proposed development, these are:
- § A sequential assessment (under EC15)
 - § An impact assessment (under EC16.1)
- 5.41 Policy EC15 outlines how LPAs should consider sequential assessments. EC15.1 states that LPAs should:
- a. ensure sites are assessed for the **viability, suitability and accessibility**
 - 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 centres, developers and operators have **demonstrated flexibility** in terms of scale, format, car parking provision and scope for disaggregating retail development.
- 5.42 In relation to impact assessment, policy EC16.1 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:
- a. Impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal;
 - b. Impact on town centre vitality and viability (including consumer choice and range and quality of the comparison and convenience retail offer)
 - c. Impact on allocated sites outside town centres being developed in accordance with the development plan
 - d. 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)
 - e. 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
 - f. Impact on any locally important centres
- 5.43 Further to Policies EC14, EC15 and EC16.1 stated above, Policy EC17 refers to how LPAs should consider planning applications for main town centre uses that are not in an existing centre and not in accordance with an up to date development plan. Policy EC17.1 states that where (a) applicants have not demonstrated compliance with the sequential approach (policy EC15) or (b) there is clear evidence that the proposal is

likely to lead to significant adverse impacts (policy EC16.1), planning permission should be refused.

5.44 Policy EC17.2 goes on to state that, where no significant adverse effects have been identified under policy 16.1, planning applications should be determined by taking account of:

- a. the positive and negative impacts of the proposal in terms of policy 16.1 and any other material considerations
- b. the likely cumulative effect of recent permissions, developments under construction and completed development

5.45 Policy EC17.3 adds that, judgements about the extent and significance of any impacts should be informed by the development plan, recent local assessments of the health of the town centre and any other published local information.

Regional - RPG 10

5.46 RPG10 recognises that economic performance is critical to the future scale and pattern of development in the region and that strong economic performance helps to provide the wealth needed to conserve the region's environmental assets. It also recognises that this brings pressure for new development, and that these pressures have to be managed so that environmental qualities of the region are conserved.

Regional - Cornwall Structure Plan

5.47 Policy 11 encourages economic growth in Cornwall. It states that the regeneration of urban areas and town centres as a focus for retail, commercial and business activity should be prioritised.

5.48 Policy 14 refers specifically to town centres and retailing. It places priority on the improvement and enhancement of town centres in providing shopping to meet the needs of the community. Such development should be focused in or adjoining town centres where they can help sustain the centre's viability and vitality; contribute to the improvement of the town centre environment and can be accessible to all sectors of the community by a choice of means of transport.

- 5.49 In relation to 'Other Main Towns', development should be well-integrated within the built-up area and support the role and function of the centre. The justification text for Policy 25 identifies Hayle as an 'Other Main Town' that plays an important role as a local centre for shopping, employment, community facilities and as a leisure and tourist destination. It is also recognised as having the capacity to meet the needs of the surrounding area as well as its own population.

Emerging Regional Planning Policy - Draft RSS

- 5.50 Policy TC2 of the draft RSS relates to retail development in market and coastal towns. It states the retail provision should reflect the need to compliment rather than compete with the retail facilities in the relevant strategic centre.
- 5.51 Policy EC1, albeit broadly, states that the sustainable development of the regional economy should be supported by positively promoting and encouraging new economic activity - in the areas where it can bring the greatest economic and social benefits and make the greatest contribution to reducing regional disparities in prosperity.
- 5.52 Policy EC2 states that geographical priority should be given to restructure economies and regenerate area of special need. Cornwall is identified as an area in structural decline, and therefore an area which should be given geographical priority.
- 5.53 Retail investment is encouraged in locations where it is of an appropriate scale and in keeping with their size and function. Policy EC6 seeks to ensure that such development is located where it will contribute to the regeneration and environmental improvement of town centres and can help reduce the need to travel and encourage journeys to be made other than the private car. The policy explains that the vitality and viability of existing centres must be protected and enhanced.

Local - Penwith Local Plan

- 5.54 As stated above, retail is considered to be an acceptable use in relation to the application site, under policy allocation TV-D of the Penwith Local Plan. The supporting text to Policy TV-D explains that for an effective regeneration scheme to come forward it is likely that economic drivers will be needed. As such, it states that a flexible approach is important, therefore, if a range of opportunities are to be available to potential developers.

- 5.55 The retail policies within the Local Plan place an emphasis on locating development in urban areas where there is the widest range of service provision and good accessibility to public transport networks.
- 5.56 Policy ST-1 states that the focus of development should be in the main centres of Penzance/Newlyn, St. Ives and Hayle. The Local Plan focuses on strengthening the respective roles of these centres to improve the range and quality of services available to residents and visitors. In accordance with Policy TV-1, proposals for development in, or on the edge of, a settlement should be well integrated into the form of the settlement, not have an adverse effect on areas of amenity, recreational or wider environmental value; and be of a scale and design which is in keeping with the character of the settlement.
- 5.57 Policy TV-16 specifies that major retail development should be located in the main centres 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. The policy specifies that proposals for edge-of-centre sites will only be permitted where the development cannot be accommodated in the town centre.
- 5.58 Proposals for edge-of-centre development are also referred to in Policy TV17 which states that developments will not be permitted:
- § unless the sequential test has been met;
 - § unless there is a need for the development that cannot be met in the town centre; and
 - § if they were likely to lead to a significant reduction in the range of retailing in any town centre or adversely affect the vitality and viability of any town centre.
- 5.59 The reference to demonstrating need is now outdated given the publication of PPS4 at a national level, however, for expediency this has been considered as part of the accompanying PPS4 assessment.
- 5.60 Furthermore, the Policy also states that all proposals must be readily and conveniently accessible by alternative means of transport to the private car; be compatible with surrounding land uses; and not materially affect the viability of village or neighbourhood shops.

Local - Penwith Retail Study (2007)

- 5.61 This study found that Hayle has the smallest level of retail and service provision in Penwith. Comparison and convenience retail provision is not able to retain a significant amount of locally generated shopping trips, with provision being orientated towards top-up shopping and day-to-day shopping needs.
- 5.62 The study also identified that retail expenditure was leaking from the town centre's catchment to Penzance and outside the District. To claw back shoppers, the study recommends increasing the capacity of retail provision.
- 5.63 Further detail on this study, and its forthcoming update, are referred to in the Impact Assessment which accompanies this Planning Statement.

Local - Draft Area Action Plan

- 5.64 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.

The Historic Environment

Preface

- 5.65 By virtue of the application sites' location within the Cornwall & West Devon Mining Landscape World Heritage Site and the Hayle conservation area, and in relation to the inclusion of a listed building as part of the proposals, policy relating to heritage, including archaeology is considered below.

National - Planning Circular 07/09: Protection of World Heritage Sites (2009)

- 5.66 In July 2009, the Government published Circular 07/2009 'The Protection of World Heritage Sites' which replaces and expands on the guidance in paragraphs 2.22 – 2.23 and 6.35 - 6.37 of PPG15. It gives advice on the level of protection and

management needed for World Heritage Sites, and draws attention to recent legislative measures designed to enhance the protection of these sites.

5.67 Circular 07/2009 states that World Heritage Sites are required to have effective management systems in place specifying how the Outstanding Universal Value, authenticity and integrity of each site are to be maintained. A Management Plan for each area has to be prepared to provide a framework of policies to ensure consistent management. LPAs are required to treat relevant policies in the Management Plans as key material considerations in making plans and decisions.

5.68 As such, in relation to the application site, the policies in the Cornwall & West Devon Mining Landscape World Heritage Site Management Plan are set out below.

National - Planning Policy Guidance 5: Planning for the Historic Environment (2010)

5.69 PPS5 was published on 23 March 2010 and sets out the Government's planning policies on the conservation of the historic environment. It replaces *Planning Policy Guidance 15: Planning and the Historic Environment (PPG15)* and *Planning Policy Guidance 16: Archaeology and Planning (PPG16)*.

5.70 PPS5 is being accompanied by a Historic Environment Planning Practice Guide (March 2010) which explains how to apply the principles on the PPS and provides explanations and guidance for implementing the planning policies.

5.71 The Government's overarching aim is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations. The objectives are therefore to:

- § Deliver sustainable development
- § Conserve England's heritage assets in a manner appropriate to their significance
- § Contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment

5.72 Policy HE1 provides an overarching policy in relation to heritage assets and climate change. Policy HE1.1 encourages LPAs to make decisions relating to heritage assets by seeking to reuse, and where appropriate, the modification of heritage assets so as to reduce carbon emissions and secure sustainable development.

- 5.73 Policy HE6 refers to information requirements for applications for consent affecting heritage assets. The information required to satisfy this policy is set out in the Heritage Statement which accompanies this application.
- 5.74 Unlike PPG15, the new PPS5 emphasises the need to establish the significance of each historic asset.
- 5.75 A key change since the previous PPG15 and PPS16, is the need for LPAs to identify and assess the particular *significance* of any element of the historic environment that may be affected by a proposal. Policy HE7.1 states that the following ought to be considered:
- § evidence provided with the application
 - § any designation records
 - § the historic environment record and similar sources of information
 - § the heritage assets themselves
 - § the outcome of the usual consultation with interested parties
 - § where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice ought to be pursued.
- 5.76 Policy HE7.2 goes on to state that LPAs should take account the particular nature of the significance of the heritage asset and the value that it holds for this and future generations. In doing so, as stated in HE7.4. LPAs should take into account:
- § the desirability of sustaining and enhancing the significance of heritage assets and of utilising their positive role in place-shaping
 - § the positive contribution the conservation of heritage assets and the historic environment generally can make to the establishment and maintenance of sustainable communities and economic vitality
- 5.77 Policy HE9 sets out the principles guiding the consideration of planning applications relating to designated heritage assets. It states that there should be a presumption in favour of the conservation of designated heritage assets, and the more significant the designated heritage, the greater the presumption in favour of its conservation should be. As such, substantial harm to or loss of a grade II listed building should be exceptional and substantial harm to or loss of an asset including a World Heritage Site should be wholly exceptional.
- 5.78 Policy HE9.5 and HE10 refers to the fact that not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Policy HE9.5 states that when considering proposals, LPAs should take into account the relative

significance of the element affected and its contribution to the significance of the World Heritage Site or Conservation Area as a whole. It goes on to encourage the enhancement or better revealing of the significance of such assets where an element does not positively contribute to its significance.

- 5.79 Policy HE10 relates to the consideration of applications for development affecting the setting of a designated heritage asset. It states that LPAs should treat favourably applications that preserve those elements of the setting of a heritage asset that make a positive contribution to or better reveal the significance of the asset.
- 5.80 Policy HE9.6 refers to heritage assets with archaeological interest which are not designated as scheduled monuments but which are demonstrably of equivalent significance (i.e. assets which have not been formally assessed for designation, are not designated by the Secretary of State or outside the scope of designation under the Ancient Monuments and Archaeological Areas Act 1979).

Regional - RPG 10

- 5.81 In relation to the historic environment, Policy EN3 of RPG 10 states that local authorities should afford the highest level of protection to historic and archaeological areas. New development should preserve or enhance historic buildings and conservation areas and important archaeological features and their settings, having regard to the advice of PPG15 and PPG16. The policy also states that local authorities should:

“encourage the restoration and appropriate re-use of buildings of historic and architectural value and take a particularly active role in bringing about their restoration where this would help bring about urban regeneration”.

Regional - Cornwall Structure Plan

- 5.82 Policy 2 of the Cornwall Structure Plan deals with the protection and enhancement of the natural and built environment. Policy 2 states that development throughout Cornwall must, amongst other criteria, respect local character, retain important elements of the local landscape (including historic features that add to its distinctiveness), contribute to the regeneration, restoration, enhancement or conservation of the area and positively relate to townscape and landscape character through siting, design, use of local materials and landscaping.

Emerging Regional Planning Policy - Draft RSS

- 5.83 Policy ENV5 of the draft RSS refers to the historic environment. It states that the historic environment of the South West will be preserved and enhanced. Furthermore, paragraph 7.2.14 reiterates that development proposals should make sensitive use of historic assets through heritage-led regeneration in areas for growth and change, particularly where they bring Buildings at Risk, redundant or underused buildings into appropriate use. It goes on to state that it is important to recognise the associated benefits for business – whilst ensuring that historical assets or their significant are not diminished.

Local - Penwith Local Plan

- 5.84 With regard to the historic environment, the Local Plan mirrors Government Policy and states that proposals within areas of great historic value and those affecting archaeological remains, will not be permitted where it would harm the historic character of the landscape or the value, character or setting of the remains.
- 5.85 Policy TV-10 states that proposals for development that would directly affect a listed building will not be permitted unless they respect:
- § its intrinsic architectural and historic value,
 - § its design and particular physical features and;
 - § its setting and contribution to the local scene.
- 5.86 Policy TV-6 relates to proposals that would affect a Conservation Area. It states that they must not conflict with the objective to preserve or enhance the character or appearance of the area in terms of scale, siting, design and materials. Development that would have an adverse effect on the character, appearance or architectural and historic importance of a conservation area will not be permitted. Within Conservation Areas the development of commercial premises will be required to respect the character and appearance of its surroundings, in accordance with Policy TV-17 of the Local Plan.
- 5.87 In relation specifically to Hayle, paragraph 7.3.10 refers to the heritage-led regeneration initiative - 'Hayle Townscape' - which aims to encourage sustainable investment in the historic town by regenerating the physical environment and reinforcing the quality of the town's heritage.

5.88 Amongst others, it is relevant to note the following objectives of the Townscape Heritage Initiative (THI):

- § to support the continuing regeneration of Harvey's Foundry;
- § to significantly reduce the number of historic buildings known to be in serious disrepair or in danger of becoming so;
- § to promote sustainable re-use of vacant or under used historic buildings;
- § to restore lost architectural features from the street facing elevation of historic buildings;
- § and to restore and/or upgrade historic street and paving surfaces and other features at key locations in the town.

Cornwall & West Devon Mining Landscape World Heritage Site Management Plan

5.89 Circular 07/2009 (as set out above) states that World Heritage Sites are required to have effective management systems in place specifying how the Outstanding Universal Values (OUVs) are to be maintained. Any relevant policies in the Management Plan are a key material consideration in planning decisions.

5.90 In accordance with this requirement, a Management Plan for the Cornwall and West Devon Mining Landscape Area has been prepared and covers the period 2005 – 2010. It provides a framework of policies to ensure that there will be no detrimental impact on the OUVs.

5.91 The Management Plan divides the key issues and strategic policies into five key themes: Administration, Protection, Conservation, Presentation and Marketing. The policies relating to protection and conservation are the most relevant and are set out in the Heritage Report that accompanies this application.

Local - Supplementary Planning Guidance

5.92 Supplementary Planning Guidance has been prepared in relation to conservation areas and listed buildings - 'Listed Buildings: a guide for owners and occupiers' (2005) and 'Conservation Areas: a guide for owners and occupiers' (2005).

Design

Preface

- 5.93 This section sets out the key design policies to be taken into account. Further detail on how such policies have been interpreted is provided in the Design and Access Statement.

Regional - Cornwall Structure Plan

- 5.94 Policy 2 of the Structure Plan highlights the need for development to positively respond to townscape and landscape character through siting, design, use of local materials and landscaping.

Regional Guidance - Design Statement for Cornwall 'Achieving Quality in the Built Environment' (2002)

- 5.95 The Design Statement sets out how to achieve good design and is structured around two main strands - the characteristics of good design in Cornwall and the process of developing good and sustainable design.

Local – Penwith Local Plan

- 5.96 Policy GD-1 states that development should be integrated with its surroundings in terms of scale, siting and design and be in keeping with the character of the district. Policy GD-2 refers specifically to the design and layout of development – and that it should:

- § Respect traditional patterns of development and building styles, form and detailing
- § Incorporate materials that are in keeping with the locality

- 5.97 Further to the above, where appropriate, policy GD-2 states that development should:

- § Maximise solar gain and utilise energy efficient building types
- § Provide a safe and secure environment which reduces the risk of crime
- § Make provision for walking and cycling which is safe, convenient and attractive and include secure cycle parking facilities

- § Make provision for the needs of disabled people and young children in terms of movement to, from and within the site
- § Retain and incorporate existing trees which contribute to the character of the site or amenity of the surrounding area
- § Seek to maximise public transport opportunities

5.98 Policy GD-3 relates to landscaping and planting and is discussed in further detail in the Landscaping Statement.

Accessibility and Transportation

Preface

5.99 This section reviews the relevant policy regarding accessibility, transport and car parking standards. It ought to be read alongside the Transport Assessment (TA) which has also been submitted as part of this planning application.

Planning Policy Guidance 13: Transport (2001)

5.100 PPG13 sets out the Government's objectives for integrating land use planning and transport. PPG13 stresses the significance of car parking policies and the provision of spaces within new development, in determining travel demand and transport choices. It emphasises the importance of reducing car parking within new development so as to encourage sustainable travel choices.

5.101 Paragraph 4 of PPG13 sets out the objectives of the guidance. These are to:

- § *promote more sustainable transport choices for both people and for moving freight;*
- § *promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and,*
- § *reduce the need to travel, especially by car".*

5.102 PPG13 states that the Government wants to help raise awareness of the impacts of travel decisions and promote the widespread use of Travel Plans (TP's) amongst businesses, and other organisations, in order to deliver sustainable transport objectives. The aims are to reduce car usage and increase the use of public transport, walking and cycling, and to encourage more environmentally friendly delivery and freight movements.

- 5.103 PPG13 advises that TP's should be submitted alongside planning applications which are likely to have significant transport implications, including those for developments comprising jobs and services, and smaller developments in other locations where there are local initiatives or targets set out in the Development Plan or Local Transport Plan for the reduction of road traffic, or the promotion of public transport, walking and cycling.

National - Planning Policy Statement 4: Planning for Sustainable Economic Growth

- 5.104 Policy EC18 of PPS4 relates to the application of car parking standards for non-residential development. It states that local parking standards should apply unless:

- a) the applicant can demonstrate that a higher level of parking provision is needed and shown the measures proposed to be taken to minimise the need for parking; and
- b) The LPA is satisfied that parking provision is consistent with any town centre parking strategy and the facilities will serve the town centre as a whole and this has been secured before planning permission is granted, and the scale of parking is proportionate to size of the centre.

Regional – Regional Transport Strategy

- 5.105 The Regional Transport Strategy (RTS), provides a strategic transport framework for Local Transport Plans. Key objectives of the RTS are:

- § To support the spatial strategy of the Regional Transport Strategy
- § To reduce the impact of transport on the environment
- § To secure improved accessibility to work, shopping, leisure and services by public transport, walking and cycling
- § To create a modern efficient and integrated transport system
- § To ensure the safe use of the regional transport network

Regional – Cornwall Structure Plan

- 5.106 Transport policies and proposals are identified in Section 3 of the Structure Plan. Policy 27 sets out the transport approach to supporting the spatial strategy and includes:

- § Integrated strategies for the key towns where development will be focussed. There will be an emphasis on an enhanced role for public transport, walking and cycling, and network management including parking, park and ride and consistency of charges.
- § An integrated public transport system, linking the main settlements based upon the SPTN (Strategic Public Transport Network) comprising the rail network, bus branch lines, core bus corridors (an hourly weekday service) and waterborne transport.
- § Major scheme proposals to improve links between the County's main towns, along with maintenance of the highway infrastructure for safety and environmental reasons.

5.107 The policy also identifies the reduction in car parking as a key part of the transport strategy. The policy contains the County Parking Guidelines referred to later in this document. Policy 28 relates to accessibility and requires new development to ensure:

- § Opportunities to optimise walking, cycling and public transport are reflected in the scale, location and form of proposals
- § The effective management and safe movement of traffic

Local – Penwith Local Plan

5.108 General guidance on new development is contained at Section 5 of the Local Plan and includes relevant policies GD-2 and GD-5. Policy GD-2 requires that the layout of development should:

- (v) make provision for walking and cycling which is safe, convenient and attractive and include secure cycle parking facilities;
- (viii) seek to maximise public transport opportunities.

5.109 Policy GD-5 advises that proposals for development will only be permitted where safe movement of traffic can be accommodated without the need for works that would have an adverse effect on the character and amenity of the surroundings.

- 5.110 In terms of transportation policies, those relating to car parking are of particular relevance. Policy TP-12 states that the provision of car parking in any development must be related to the operational needs of the proposal and the availability of alternative means of transport to the private car.
- 5.111 Policy TP-13 advises that new car parks will not be permitted unless they constitute the relocation of an existing facility in a manner that offers other community benefits.

The Natural Environment

Preface

- 5.112 This section considers the planning policy context for issues relating to the natural environment - including ecology, biodiversity and flood risk.

National - Planning Policy Statement 9: Biodiversity and Geo-Conservation (2005)

- 5.113 PPS9 sets out planning policies on protection of biodiversity and geological conservation through the planning system. Paragraph 1 sets out the key principles. This states, amongst other things, that plan policies and planning decisions should aim to maintain, enhance, restore or add to biodiversity and geological conservation interests. Where granting planning permission which would result in significant harm to those interests, LPAs will need to be satisfied that the development cannot reasonably be located on any alternative site that would result in less or no harm.
- 5.114 In relation to Sites of Special Scientific Interest (SSSI), the general presumption is that any development that may have an adverse effect on an SSSI should not normally be granted permission.
- 5.115 The Good Practice Guide applies a five-point approach to planning decisions for biodiversity - information, avoidance, mitigation, compensation and new benefits.

National - Planning Policy Statement 25: Development and Flood Risk (2006)

- 5.116 PPS25 sets out Government policy on development and flood risk. Its aims are to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.

5.117 The aim of the Sequential Test (as outlined in Annex D of PPS25 and Chapter 4 of the PPS25 Practice Guide) is to encourage preference to be given to locating new development in areas at the lowest probability of flooding (i.e. Flood Zone 1).

Regional - RPG 10

5.118 With regard to the natural environment, Policy EN1 identifies the need to provide for the strong protection and enhancement of the region's internationally and nationally important landscape areas and nature conservation sites.

Regional - Cornwall Structure Plan

5.119 Policy 2 of the Cornwall Structure Plan refers to character areas, design and environmental protection. Amongst other criteria, it states that development must, retain important elements of the local landscape, including natural and semi-natural habitats, hedges, trees, and other natural and historic features to add to its distinctiveness. Furthermore development ought to contribute to the regeneration, restoration, enhancement or conservation of the area.

Regional – Level 1 Strategic Flood Risk Assessment (SFRA)

5.120 A Level 1 Strategic Flood Risk Assessment (SFRA) was published by Cornwall Council in December 2009. At the time of writing of this report the SFRA had not been adopted by the Council. The SFRA has been reviewed and the information therein can be used to inform any Flood Risk Assessment.

Local - Penwith Local Plan

5.121 Policy CC-7 of the Local Plan states that proposals for development which would significantly harm the nature conservation value or geological interest of a SSSI will not be permitted.

5.122 Policy CC-13 relates to tree planting and hedgerow schemes. It encourages schemes which are in keeping with the character of the landscape – though the use of native species where appropriate and appropriate aftercare and management measures.

5.123 In considering proposals for the redevelopment of the harbour, policies relating to the protection of the coast and the protection of flood defences also apply.

Other Policy

Local - Hayle Area Plan 2005 – 2025

- 5.124 The Hayle Area Plan was prepared under the Market and Coastal Towns initiative by the local community as a community-led strategic plan for the town and surrounding area. It is a bottom up policy that helped shape the Penwith LDF.
- 5.125 The Plan highlights various goals within different priority areas. In relation to Hayle Harbour it states that it's objective is:

“To ensure that the development of the harbour makes the contribution that it could to Hayle by creating new jobs, attracting more tourists and visitors, improving the environment and preserving wildlife; and preserving and promoting our heritage and unique water-front landscape”.

6.0 KEY PLANNING CONSIDERATIONS

- 6.1 This section examines the key planning considerations material to the determination of this application. Where appropriate, it draws upon conclusions set out within other supporting documents (i.e. the ES) that accompany the planning application.
- 6.2 From the analysis of the planning policy context, it is clear that the key issues that need to be considered are as follows:
- § the principle of development;
 - § retail issues i.e. impact and the need to comply with recently published PPS4: Planning for Sustainable Economic Growth, and retail development plan policy;
 - § heritage and the historic environment, including the need to preserve and enhance the character of the listed buildings and the conservation area and, the impact upon the World Heritage site;
 - § the natural environment;
 - § sustainability;
 - § design;
 - § flood risk;
 - § accessibility and transportation; and
 - § other material considerations, including economic regeneration and job creation and residential amenity
- 6.3 Each of the above key issues are considered in turn, with conclusions then drawn as to whether the proposal meets the requirements of national policy guidance and development plan policies - having regard to other material considerations which might indicate otherwise.
- 6.4 Policy EC10.2 of PPS4 sets out an overarching requirement for proposals for economic development to satisfy. These include matters related to climate change, accessibility, design and regeneration. These matters have been considered as part of the suite of supporting documents, including this planning statement. The final part of this section draws together the assessments that have been made in relation to EC10.2 to provide an overall conclusion in this regard.

The principle of development

- 6.5 The planning policies that have relevance to the principle of the proposed development on the site were examined under Section 5 of this Statement.
- 6.6 The application site represents a previously developed site on the edge of the existing town centre of Hayle. The proposal to relocate the existing builder's merchants to another site within Hayle will facilitate an opportunity to redevelop a sustainable site in terms of its urban location, and to make best use of a sustainable site close to an existing town centre.
- 6.7 The site will deliver economic development with environmental and social benefits – which will provide for improved choice and competition, and provide good quality development in line with the aims of PPS1.
- 6.8 In line with RPG10 (Policy VIS2) the proposal will result in the suitable development of previously developed urban land and provide a balance of land uses in the locality. The proposal is in line with Policy SS21 and Policy EN4 which refer to coastal towns being the focal points for development and service provision which encourage development of brownfield sites. The supermarket development proposed will be in line with saved Policy 25 of the Cornwall Structure Plan given the emphasis that it places on 'other main towns and local centres' to be able to meet the needs of their own populations and surrounding areas to reduce the need to travel.
- 6.9 The Penwith District Local Plan identifies Hayle under Policy TV1 as being a town where development will be focused and where proposals should maximise the use of brownfield land.
- 6.10 Policy proposal TV-D specifically allocates the application site under the South Quay / Foundry Yard allocation as an area suitable for mixed use development, including retail. The allocation of the site is subject to a number of other tests which are discussed further below, however, the principle of the development of this site has been demonstrated to be entirely in accordance with National Planning Policy statements and guidance, and in accordance with each tier of the regional and development plan system.
- 6.11 At a local level, the South Quay is identified specifically as being a site suitable for development in order to assist with the recognised need for the regeneration of the

harbour area. The area is identified as having the benefit of good access to the main road network and to the town centre.

- 6.12 Likewise, in the emerging LDF, the site continues to be suggested as being suitable for regeneration development.
- 6.13 In summary, the principle of the development of this urban brownfield site is supported at all levels of planning policy and guidance, both in terms of established and adopted policy and in terms of emerging policies. Detailed matters are discussed in the following paragraphs.

Retail Issues

- 6.14 As highlighted within the previous section, the key policy tests that the proposal needs to comply with are now set out within PPS4: Planning for Sustainable Economic Growth. The key tests are that the proposal satisfies a sequential assessment, and that the impact upon the town centre and other allocated sites is assessed to be acceptable.
- 6.15 Previously, it was required to demonstrate that there was a 'need' for new floorspace for retail under PPS6. PPS4 has now superseded PPS6 and, in so doing, the need test no longer applies in its previous sense. However, 'need' is still a material consideration within the assessment of the application given the development plan policies described in the previous section and the reference within PPS4 to 'need' in terms of scale and impact upon town centres.
- 6.16 The PPS4 Impact Assessment accompanying the planning application addresses the tests set out within PPS4 in detail, and assesses the identified need for additional retail floorspace in Hayle in order to demonstrate that the proposal is of an appropriate scale, and has an acceptable impact.
- 6.17 With regards to need, Hayle has been identified within the Penwith Retail Study (PRS) as the settlement within the former district of Penwith which is in most need of a step change in retail provision. The recommendations of the report are that a single large foodstore should be provided within Hayle in order to compete with other centres and 'claw back' the significant amount of expenditure which is currently lost from the town to other towns and out of centre locations.

- 6.18 The Impact Assessment demonstrates that even within the introduction of the West Cornwall Retail Park and the extension to Lidl, the leakage of retail expenditure from Hayle has remained largely the same as before. Accordingly there is a continued need to claw back this expenditure in the interests of the vitality and viability of the town centre, and in sustainability terms.
- 6.19 This application proposal addresses this need in an appropriate manner in order to provide the step change required in retail provision within Hayle.
- 6.20 Full details of the impact calculations and the assessment are contained within the PPS4 Impact Assessment accompanying the application.

Sequential Assessment

- 6.21 The document also includes the findings of the sequential assessment that is required in order to determine whether the site is the most appropriate for retail development.
- 6.22 The document demonstrates that there are no suitable centrally located town centre sites capable of accommodating a food supermarket of the size required in order to meet the identified need. This allows edge of centre sites to be considered for accommodating additional provision. The report goes on to confirm that the application site is the most appropriate location capable of accommodating the foodstore development required. This is due to the fact that it is an edge of centre site (in relation to Foundry town centre), and in a location ideally suited for town centre uses that will facilitate linked shopping trips and provide benefits to the vitality and viability of Hayle town centre.
- 6.23 Developments in an out of centre location should only be considered where it has been clearly demonstrated that no suitable or viable centre or edge of centre sites are available. Consequently, the proposals by Asda and Sainsbury's fail the sequential test and as such are contrary to retail policy (as confirmed and reiterated in GVA Grimleys assessment of the Sainsbury's proposal of March 2010).
- 6.24 The PPS4 assessment highlights that there is one other edge of centre site which is available and of an appropriate size to accommodate a large foodstore proposed. The GVA Grimley assessment of the ING proposals for a foodstore (detailed below), in relation to the sequential approach, acknowledges that the Jewson site, in an edge of centre location, has the potential to provide a walking distance (to the town centre)

which is not materially different to the South Quay proposal. As such, as stated by GVA Grimley in paragraph 3.11 of their assessment 'the Jewson site should not be ruled out as being significantly different in terms of the sequential assessment'.

6.25 The South Quay site, having recently been promoted by ING by virtue of an outline planning application for a foodstore development is not, however, considered to be suitable for a major foodstore development - by virtue of its highly prominent location and the impact that a large supermarket development would have upon the listed structure on which it would have to be located and the negative impact upon the character of the Conservation Area and the World Heritage Site status. Due to significant objections being lodged in relation to the above ING proposal in this respect, the application was withdrawn in March 2010.

6.26 Consultation of heritage bodies as part of the ING application resulted in significant objections being lodged to the proposals as follows:

§ the Commission for Architecture and the Built Environment (CABE) strongly objected to the planning application on the basis that it was designed as an out of town retail park approach not appropriate to a town centre location or the unique historic and coastal character of the site. The objection stated that the proposal was a fundamental departure from the approved Hayle Harbour Masterplan and went against all the sound aspirations expressed within that application for an intimate scale, mixed use development. They also stated that a planning application for a single building within this location should not be considered in outline (letter dated 22 January 2010);

§ the International Council on Monuments and Sites (icomos) lodged a fundamental objection by letter on 31 January 2010. Their objections related to the impact of the proposal on the Hayle Harbour part of the WHS. They stated that there a significant number of negative impacts, including the loss of visual coherence of the Quays, the loss of local distinctiveness and fundamentally, an introduction of a large volume and core structure that would distort the historic evidence and spatial relationships. Significant concerns were expressed over the scale of the superstore in this location and that it would bear little relationship to Penpol Terrace;

§ It is know that the English Heritage Advisory Committee also lodged an objection to the scheme. This objection followed advice given by English Heritage at a pre-application stage that the scheme would harm the WHS

and the Conservation Area. Central to English Heritages' objection was that the ING proposals was the fact that they involved building over the covered slipways that would have been exposed as part of the previous scheme.

- 6.27 GVA Grimley, on behalf of Cornwall Council, have assessed retail planning policy in relation to the ING proposal. This confirms that whilst the South Quay site performs well against the sequential approach, the overall suitability of this location will be dependent on the Council's consideration of a wide range of development control matters – including the impact on the character and appearance of the local area, and the wider regeneration of the harbour area. Furthermore, GVA Grimley consider that any positive impacts associated with the ING proposal (impact on consumer choice and retail offer, accessibility) are outweighed by negative impacts relating to the scale of the proposal and financial impacts. As such, it is suggested that a smaller store would offer the same positive impacts, whilst reducing the severity of its negative impacts.
- 6.28 In light of the GVA Grimley assessment, in addition to the fundamental objections from key heritage and design bodies in relation to the principle of siting a large scale foodstore on the South Quay, the site is not considered to be a suitable edge-of-centre location for a foodstore.
- 6.29 The Jewson site therefore represents the most the appropriate, suitable, available and viable location for a single large scale foodstore in Hayle - and is therefore the sequentially preferable site.

Impact Assessment

- 6.30 The Impact Assessment carried out under policy EC16 of PPS4 demonstrates that the proposals meet the following tests:
- (a) The impact on existing, committed and planned public and private investment in the centres of the catchment area is acceptable. Specifically there are no planned developments within the immediate or nearby identified town centres which would be affected by the development.
 - (b) The impact on town centre vitality and viability will be positive and will improve local consumer choice and a range of quality of convenience retail goods in the area. Healthchecks on Foundry and Copperhouse town centres have demonstrated that they are vital and viable and, will remain as such due

to the positive impact that development of this edge of centre site will have on recapturing expenditure currently lost to out of centre sites elsewhere. The drawing in of shoppers into the town centres will encourage linked trips to existing retail premises.

- (c) The identified need for a large scale foodstore set out within the PRS will be met by this proposal and will therefore have a positive impact upon the vitality and viability of the Hayle town centres.

The proposals will not have any negative impact upon allocated sites outside of town centres that are being developed in accordance with the Development Plan. The only site that needs to be considered in this regard is the Hayle Harbour Regeneration Proposals with a resolution to grant planning permission under reference 08-0613-P. Details of this application are set out within Section 3 of this statement. The mixed use scheme proposed has been the subject of a comprehensive review by the applicants as a result of the economic crisis which has had a significant effect on the implementation of the Masterplan scheme. ING state within their latest, albeit withdrawn, application for a supermarket on South Quay that they consider that South Quay has the greater potential to come forward in the short term. They state that there are significant financial costs associated with the development of the South Quay site which require a higher value user in the form of a supermarket.

However, as stated above and in the consultation responses to the supermarket proposals, there were fundamental objections to this application. The wider Masterplan scheme proposed under reference 08-0613-P therefore remains the only scheme which has been endorsed within the local plan allocation under Proposal TV-D. The development of the Jewson site is of a different nature to the original ING proposals and will therefore complement them rather than compete. The Actoris proposals will not therefore impact on any sites being brought forward in line with development plan policies in non-town centre locations.

- (d) The impact of the proposal on in-centre trade / turnover and on trade in the wider area has been proven to be appropriate. The PPS4 Impact Assessment shows that there is still an urgent need for a new foodstore in Hayle following the extension to Lidl and the new M&S at West Cornwall Retail Park. The analysis shows that within Zone 3, Hayle's market share is

estimated to increase from 31% to 68% as a result of the proposals. The Morrisons supermarket will therefore more than double the amount of trade currently retained by Hayle. Whilst this will have a modest impact upon the existing Co-op store at Copper Terrace, the analysis shows that the Morrisons store will secure the uplift in market share proposed by the PRS without there being an adverse impact on existing town centre stores. Effectively, the proposals will recapture trade currently lost outside of Hayle as opposed to impacting adversely upon existing town centre stores. The trade diversion will therefore come from the ring of out of centre stores that surround Hayle, including Tesco at Camborne and the Morrisons and Tesco stores in Penzance. As the vast majority of these shopping trips are undertaken by car, this impact represents a beneficial reduction in travel distances and therefore greenhouse emissions. In conclusion, the level of diversion that will result from the proposal is accepted in the PRS as the appropriate means by which Hayle should become a more self-contained shopping destination.

- (e) The proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres. The scale of the proposal is consistent with the role and function of Hayle and its catchment, and will not result in the retail offer in Hayle becoming out of proportion with its role in comparison with surrounding towns.

Retail Summary

- 6.31 The proposal has therefore been demonstrated to be compliant with the key tests that are set out within PPS4 in respect of the sequential tests and the retail impact assessment. The site is the most appropriate and suitable edge of centre site in order to develop a supermarket to meet the identified need, in the identified manner (i.e. a single large foodstore) in order to recapture the significant leakage of expenditure from Hayle and to reduce car trips made for food shopping. This will have significant benefits for Hayle's town centre(s) in the form of a positive impact upon retail, their vitality and viability, and improving consumer choice. The proposal will encourage linked trips to the town centre(s) and will provide for greater opportunity for cycling and walking, given the edge of centre location.
- 6.32 A key conclusion of the March 2010 GVA Grimley report was that the ING proposals for a 3,159 sq m (net) supermarket would have a significant detrimental impact on town centre turnover by virtue of its large scale. The conclusions suggested that

benefits related to vitality and viability, claw back of customer expenditure and consumer choice could be realised with a smaller scale store. The Actoris Ltd proposals, at 1,858 sq m (net) represent a scheme which can achieve the positive benefits for Hayle outlined by GVA Grimley without the negative impacts upon town centre turnover associated with a larger scheme.

- 6.33 The proposal therefore satisfies the key tests within PPS4, along with those set out at a regional level (i.e. RPG 10 and the Cornwall Structure Plan) and local level (i.e. the Penwith Local Plan).
- 6.34 PPS4 includes a general impact policy test under EC10. This pulls together a number of different requirements in relation to planning applications for economic development including limited carbon emissions, providing choice of means of transport, high quality and inclusive design, regeneration and impact on local employment. These factors are assessed within the individual supporting documents, and are summarised in the following text. Conclusions on Policy EC10 are therefore drawn later in this statement.

Heritage considerations

- 6.35 The heritage context of the site has been considered in earlier sections to this statement, and has been considered in detail within the Heritage Statement. The latter document includes a thorough historic evaluation of the site, including an examination of the Outstanding Universal Value of the World Heritage site and the significance of the historic asset of the site. The document provides an evaluation of the scheme, the proposed alterations to the listed building, and how the interpretation of the heritage background has been addressed through the proposal. The key issues can be summarised as follows:
- § The assessment of the significance of the heritage assets on the Jewson site – the existing quay walls and the Grade II Listed Harveys drying shed.
 - § The impact of the proposed development on the Outstanding Universal Value of the Cornwall and West Devon Mining Landscape World Heritage Site.
 - § The archaeological implications of the development – specifically relating to the lime kilns, slipways and adjacent cottages.
- 6.36 The scheme has been devised following pre-application consultations with English Heritage, the Council's Conservation Officer, and the Council's World Heritage Site Officer.

- 6.37 The archaeological context has been explored with the Cornwall Archaeological Unit, and a separate Archaeology Assessment has been produced in line with the brief provided (Technical Appendix 7 of the ES). Chapter 7 of the ES assesses the heritage and archaeological impacts of the proposals and sets out a suggested programme of mitigation.
- 6.38 The accompanying Design and Access Statement and Heritage Statement sets out the character of the site and the design philosophy for addressing its specific heritage status.

Design Philosophy

- 6.39 The site strategy and design philosophy has emerged in accordance with pre-application consultation with, and feedback from, the Council and English Heritage. The design acknowledges the sites historical architectural features, and ensures that the design of the new building is not detrimental to them and is appropriate for the location. Throughout the design process a number of design options and scenarios have been explored – notably in relation to the relationship between the proposed foodstore and the listed building, the positioning of the new building, potential glazing of elevations, the treatment and use of the listed building, the massing of the new building, visual impact and permeability of the proposed development.
- 6.40 Throughout the process, the designers have acknowledged and prioritised the sensitive visual and historic nature of the site and its locality. As such, the historical setting of the site has had a material influence upon the design of the new build construction. This has been the case since the inception of the design process – by virtue of the commissioning of an Architect Accredited in Building Conservation and the preparation of a Heritage Statement accordingly - both of which have contributed to the iterative design process.

Significance of Heritage Assets

- 6.41 The proposal has been devised in order to satisfy the key tests set out within the policy discussion at Section 5 of this statement (i.e. PPS5). PPS5 requires the identification and assessment of the particular significance of individual heritage assets. In meeting Policy HE7.1 of PPS5, the Heritage Statement provides relevant evidence (i.e. designation records, historic environment records), details of the

heritage assets themselves, details of consultation and a detailed understanding of the significance of the heritage assets.

- 6.42 PPS5 asserts that there should be a presumption in favour of the conservation of designated heritage assets (i.e. the listed building). PPS5 also advises that the more significant the designated heritage, the greater the presumption in favour of its conservation should be.
- 6.43 The designated heritage assets in question are the listed timber shed and the partly exposed quay walls.
- 6.44 The timber shed is to be consolidated, stabilised and enhanced as part of the proposed application. The principle of retaining the listed building is clearly representative of a 'presumption in favour' of the listed building. The use of appropriate materials to enhance and stabilise the listed building, which otherwise is likely to deteriorate further, represents a net improvement to the designated heritage asset. In effect, it is considered that the listed building will be of greater historical significance, due to the proposed improvements and enhancement, than it does in its existing state.
- 6.45 The quay wall lies within the site area - its setting will be respected by the set back of the proposed new building and improved through the removal of the modern addition of the handrail to the wall and the nearby chain link fence which currently detract from its setting. Potential is also being explored for the exposure of the wall by removing debris and fill which have accumulated next to it over time in order to improve its setting and significance further.
- 6.46 In relation to the WHS status of the site, policies HE9.5 and HE10 of PPS5 state that LPAs should take into account the relative significance of the element affected and its contribution to the significance of the WHS or Conservation Area as a whole. The proposed development is in accordance with PPS5's encouragement to enhance or better reveal the significance of such assets where an element does not positively contribute to its significance. Undoubtedly, the proposed development will better reveal the listed building – for the public to appreciate in full.
- 6.47 Policy HE10 states that LPAs should treat favourably applications which preserve those elements of the setting of a heritage asset that makes a positive contribution to or better reveal the significance of the asset – such as this application.

Impacts on wider heritage features

- 6.48 Careful consideration has been given as to how the impact of the massing of the new building, and its roofscape, will not be visually intrusive and respect the importance of the hill fort to the south of the site when viewed from the quays. It is considered that the proposed development will significantly improve the impact of the site on important views.
- 6.49 Detailed evaluation of the visual landscape impact on the proposals have been undertaken and are reported in the ES accompanying the application.

Conservation area impact

- 6.50 The key test with regard to the Conservation Area status and the impact upon the listed buildings is that the proposal should preserve or enhance the character of the area and the setting and character of any listed buildings.
- 6.51 In terms of the impact upon the Conservation Area, the removal of the 20th century Jewson buildings, and the modern additions to the listed timber shed will facilitate a considerable improvement in the character of the Conservation Area by the removal of these unsympathetic additions to setting of the listed building and the Conservation Area. The proposed new build will significantly improve the impact of the site on the character of the Conservation Area.

Archaeological interpretations

- 6.52 One of the key issues arising from the consultation was the need to interpret the archaeological character of the site. Two key features of the site are the lime kilns associated with the Harveys Foundry, and the slipways of a quay which had previously extended into the site but have been subsequently filled in. The extent of the lime kilns and the slipways are shown on the 1908 plan of the site are highlighted on the proposed site layout (drawing reference SP241-P07).
- 6.53 Dialogue with Cornwall Council and English Heritage indicated that slipways are considered archaeological features which they want to see preserved in situ. The view expressed was that the Outstanding Universal Value of the WHS would not be affected if the slipway is to remain buried and preserved in situ. The siting of the proposed buildings is such that it will not impinge upon the key hidden archaeology of the site. There is an opportunity to interpret the edge of the former quay in the

surface treatment of the car park – which could be supported by a public interpretation board. This is considered to have a net positive benefit in the historical value of the existing site.

- 6.54 No development, other than landscaping / resurfacing will take place over the key features, therefore the proposed development will ensure that the long term integrity of the historic harbour will be preserved, along with the preservation of the archaeological remains of the lime kilns. The interpretation within the surfacing of the car park will protect and enhance the Outstanding Universal Value of the World Heritage Site through the positive benefit of the interpretation proposed.
- 6.55 The slipways extend a significant distance into the site and would result in a large area of the site being prevented from use as car parking. Approximately 32 spaces would be lost if the slipways were to be exposed in an area of the car park closest to the town centre (which would be key in ensuring that the proposal has spin-off benefits through linked trips to the Foundry centre). Exposure of the slipways would therefore potentially compromise the proposal's ability to enhance the vitality and viability of the Foundry town centre.

Listed building works

- 6.56 The proposals will bring about significant improvements to the listed timber shed building by means of its refurbishment and structural works to preserve the building for the long term. These are considered in detail in the Heritage Statement, however the key benefits are to enhance the character and appearance of the listed building by virtue of the following works:
- § remove modern roof trusses and replace with Heritage supports for new slate / clay ridge roof, reinstating the original roof to the building and therefore bringing about the significant enhancement of the character compared with the existing asbestos sheeting roof and trusses;
 - § re-pointing of the building and re-lime washing in order to improve its appearance within the Conservation Area;
 - § stabilisation of the building and consolidating the large crack which currently exists in the building – through Cintec anchors and lime mortar repointing;

- § the alien conservatory structure is to be removed to enable the gable of the building to be viewed. New lateral restraint and stabilisation will be provided in the form of a structural timber framed element which is to be sympathetically engineered and incorporated into the existing building;
 - § new steel beams (which replaced the original granite piers) are to be replaced with new granite piers and will be complemented by new gudgeon hinge pins to match those of the existing gudgeon hinge pins; and
 - § Exterior decoration of the drying shed using traditional breathable paint on the external wall finishes, other than the brick ventilation panels.
- 6.57 In summary, the proposed works to the listed building will significantly improve the structural and architectural integrity in the building, therefore greatly enhancing its historic character. This will bring about an improvement in the contribution of the listed building to the townscape and the Conservation Area.

- 6.58 The setting of the listed building will be improved through the removal of the modern conservatory building and the demolition of the unsympathetic Jewson buildings. The proposed new supermarket has been carefully designed in order to respect the setting of the listed timber shed by considering the fit, balance, and effect of setting to ensure that the new buildings do not physically affect the listed structures. An appropriate separation distance has been maintained to ensure the building's integrity is unaffected.

Heritage Summary

- 6.59 The heritage context of the site has been considered in great detail in formulating the proposals. Detailed consultation has been undertaken with statutory undertakers and the Council's heritage departments, with the result that the proposals are considered to have a significant beneficial impact of the heritage context of the site through enhancing the character of the conservation area, improving the setting of the listed buildings, and respecting the World Heritage Site status of the area. Specific benefits include the significant improvements in the appearance of the listed building, the interpretation of the archaeological features on-site, and the sensitive design of the proposed new building.

The Natural Environment

- 6.60 An ecological evaluation of the site and its context has been undertaken and documented in the accompanying ES. This was undertaken following consultation with Natural England, the Environment Agency and the RSPB.
- 6.61 The desktop study and the walkover survey of the application site has demonstrated that the site itself is of low ecological value – this is reported in chapter 8 of the ES. There are no protected species of flora or fauna within the site - principally as the site is brownfield consisting largely of buildings with a concrete / tarmac base.
- 6.62 It is recognised that the wider area is subject to ecological designations due to their importance for wild fowl habitats. The Estuary is subject to designation as a SSSI. Other non-statutory designations also apply to the wider area, including an Area of Great Scientific Value and the RSPB Hayle Estuary Nature Reserve. As assessed in the ES, and acknowledged in the landscaping scheme, there is a colony of Petalwort (a protected species) near the edge of Carnew Pool, but outside of the site boundary.
- 6.63 There are no direct impacts on the ecological value of the site brought about by, or resulting from, the proposed development. Rather, it is considered that the proposed development has the potential to impact positively on the ecological value of the site and, through careful design of the buildings and management of the construction phase, will have no detrimental impact upon wider ecological receptors. Mitigation measures will help discourage access by vehicles to the Spit, whilst signage is intended to educate the users of the Public Right of Way.
- 6.64 The proposal will include a landscaping scheme in order to enhance and protect the biodiversity within and around the site, and to provide important screening for the wild fowl in the adjacent SSSI. The design of the building has been revised through the pre-application process in order to remove glazing panels from the estuary elevation of the building. Pollution prevention measures are recognised to be required as part of both the construction phase and the detailed design of the site. A lighting scheme needs to be devised as part of a detailed condition to be fit for purpose, and ensure that light pollution does not dissipate in a detrimental manner into the SSSI or vertically – this can be appropriately and adequately achieved. Litter bins and dog waste bins are to be provided as part of a detailed scheme in order to ensure that the SSSI and the surrounding area is not littered as a result of the proposals.
- 6.65 At the request of ecology consultees, there will be no access to the public right of way at the northern boundary of the site in order to reduce noise, litter, light and disturbance to birds.

- 6.66 Importantly drainage arrangements have been devised so that surface water run-off does not impinge upon the integrity of the SSSI site or, result in any other water pollution to the surrounding water courses. A detailed construction management scheme may be required in order to prevent construction materials and waste from entering the water course and neighbouring vegetated areas, and that all materials during constructions are properly contained.
- 6.67 In summary, the development site itself has been shown to be of low ecological value, and the development has the potential to enhance the biodiversity of the area through ecological enhancements. Potential for pollution is recognised as a key factor during the construction and operational phase, and detailed conditions on these points are recognised to be necessary in order to ensure the minimum impact and appropriate mitigation. Benefits to ecology will be realised in the landscaping scheme, and through a scheme of signage and informative material to educate users of the surrounding area.

Sustainability

- 6.68 By virtue of the site's status as previously developed land, its edge of centre location, and its accessibility to public transport services, the proposed development is inherently sustainable.
- 6.69 The proposed use of the site for a foodstore will reduce the need for local residents to make car journeys to neighbouring towns in order to carry out their weekly food shop. The PPS4 Impact Assessment estimates that the proposal will result in a radical improvement in Hayle's market share of food expenditure from 31% to 68%. This will result in the recapture of 37% of existing food trips that are currently made, in the vast majority (92.7%) by car, to destinations outside of Hayle. This will significantly reduce carbon commissions by both reducing the length of car trips and encouraging modal shift to more sustainable forms of transport through improved accessibility.
- 6.70 The proposed development will ensure the sustainability and durability of a designated heritage asset, the former Harveys drying shed, through the consolidation, refurbishment and enhancement works to the building (as described above). Not only will this beneficially effect the historical sustainability of the site, but will bolster the social and cultural sustainability of the site. The proposed development seeks to better reveal the significance of the site and its heritage asset – in a proud, yet sympathetic manner. This invites the public to fully view and

appreciate the only remaining listed building in the vicinity of South Quay. The materials proposed to be used in the refurbishment of the listed building are considered to be sustainable and naturally sourced (i.e. granite, stone and timber), and where possible and viable will be locally sourced.

- 6.71 The design of the proposed development considers a high level of thermal insulation to mitigate against energy loss. The roof lights are faced out of the prevailing sun and wind, and the entrance glazing has a canopy.
- 6.72 The proposed operator, Morrisons boasts a number of sustainability credentials in terms of its foodstore operation – in relation to energy efficiency, waste management and the employment of the most intelligent building services systems to reduce their running costs and therefore energy consumption. A Travel Plan has been submitted as part of the application which demonstrates Morrisons' policies for car sharing and encouragement of use of sustainable modes of transport.
- 6.73 Furthermore, by virtue of the landscaping scheme submitted as part of this application, and careful consideration of ecology and mitigation against potential for disturbance to the SSSI which adjoins the site, it is considered that the natural sustainability of the site will increase as a result of the proposed development.
- 6.74 In summary, it is considered that the proposed development will support and enhance all spheres of sustainable development – environmental, economic and social. Furthermore, the proposed development will have a significant impact in terms of the social well-being of the residents of Hayle. The provision of additional choice and range of food retail offer, and the fact that the need to travel further afield to carry out a weekly shop, will bring about significant social positive impacts.

Design

- 6.75 The design rationale for the proposals is discussed in detail within the Design and Access Statement and the Heritage Statement. The design has evolved with the benefit of detailed pre-application discussions with the Council's heritage officers and with English Heritage. The public consultation exercise has also informed elements of the design, including the preference for the final design chosen, and assistance in consideration of materials.

- 6.76 The key guiding principles in devising the scheme have been defined by the heritage status of the site, its ecological context, and the need to ensure that the site complements the existing Foundry town centre - given its edge of centre location.
- 6.77 The layout of the site has been influenced through the need to ensure good accessibility to / from the town centre in order to encourage linked trips for shoppers. The optimal position for the car park was therefore chosen in the closest position possible to the town centre in order to encourage linked trips on foot.
- 6.78 The listed building, which is required to be retained on the site, has also influenced the position, orientation and height of the supermarket building - given the need to respect the setting of the listed building. Similarly, the listed quay wall has also dictated a minimum buffer distance along the northern boundary of the site.
- 6.79 A number of design options were considered for the proposed supermarket building, ranging from a modern, contemporary design of mono pitched roofs and a 'sail' type roof structure, to a more traditional flat roof supermarket design.
- 6.80 The series of pitched roofs incorporated in the end design was devised in order to reflect the industrial heritage of the site and its surroundings and assists greatly in breaking down the scale of the supermarket building.
- 6.81 The proposed building has been orientated towards Carnsew Road in order to address the road frontage, given that that forms the entrance to the site.
- 6.82 Views across from Penpol Terrace have also been considered, as have views of the heritage features in the surrounding area. The height of the building has been kept to the minimum possible in order to ensure that the new building does not impede or detract from any views of heritage features or dominate surrounding views (including views from the Estuary).
- 6.83 An ecological influence on the design has been the decision to remove glazing from the Estuary elevation in order to prevent a hazard (and possible resultant harm) to birds.
- 6.84 The size of the building has been dictated by the need to address the identified retail need for Hayle, and to provide an appropriately-sized supermarket in order to recapture the significant amount of lost expenditure from the town. The size of the

supermarket is therefore no larger than it is required to be i.e. it is considered an optimum arrangement for both the site and the town.

- 6.85 The proposed development has therefore been designed to integrate with the heritage-ecological and locational context of the site and to provide an attractive and appropriately-sized building - in order to facilitate a new supermarket of an appropriate size for Hayle.

Flood risk

- 6.86 The site lies within an area at risk of flooding. In accordance with PPS25, a Flood Risk Assessment has been carried out, along with a sequential test to ascertain that no suitable alternative sites exist for the development – this is attached within Technical Appendix 11 of the ES.
- 6.87 Surface water run-off is a recognised important consideration, given the ecological value of the surrounding area. A detailed scheme will deliver a development that will not increase the risk of flooding to neighbouring sites. The proposed system includes a SUDS treatment drain comprising permeable paving and a filter drain – which will ensure thorough cleaning of runoff prior to disposal to the Estuary. The improvement in surface water management compared with the existing development will result in an improvement in the quality of water being discharged to the tidal estuary.
- 6.88 The FRA concludes that the majority of the site, including all proposed new buildings, is located within Flood Zone 1. Analysis of the available data has shown that only the eastern corner of the site may be at risk of flooding from the River Hayle Estuary, and is within Flood Zones 2 and 3.
- 6.89 The flood risk from Mellanear Stream, the Angarrack Stream, and the associated Copperhouse Creek is not significant. The site is not considered to be at significant risk of groundwater flooding, surface water flooding or flooding from canals or reservoirs. In order to mitigate against the residual risk of flooding to the site, it is proposed to set finished floor levels at a minimum of 4.94m Above Ordnance Datum (AOD). Currently, site levels over the majority of the site rise from 4.80 m AOD in the north to 7.13m AOD in the south. Levels in the area of scrub land in the west of the site are marginally lower – rising from 4.04m AOD in the west to 5.29m AOD in the east. The small level changes required to facilitate the service yard will not result in any additional adverse flood risk.

Accessibility and Transportation

- 6.90 A Transport Assessment (TA) and travel plan accompany the planning application. These have been prepared by ADL Traffic Engineering and contain a detailed analysis of the existing highways and transportation context of the site, followed by an analysis of the likely impacts and mitigation required as a result of the proposal. Furthermore chapter 10 of the ES assesses the impact of the proposed development in terms of transport and accessibility.
- 6.91 The TA examines in detail the likely traffic generated by the proposals compared with the existing development traffic created by the existing uses on-site. The TA also covers the pedestrian and cycle accessibility of the site and the levels of car parking required in order to serve both the store and to encourage (in conjunction) linked trips to the town centre.
- 6.92 The assessment identifies that the proposed development will be accessible by a range of transport modes given that the site is accessible by public transport, walking and cycling.
- 6.93 The travel plan has been devised in order to encourage travel by means other than the private car in line with the objectives of PPG13 and other regional and local planning policy.
- 6.94 The proposal will undoubtedly attract car trips but the assessment demonstrates that a significant proportion of the car trips to the proposed site are likely to be on the highway network in any event. However, the supermarket trips that are on the highway network at present are travelling long distances out of Hayle to make bulk weekly shopping trips to supermarkets in Pool, Camborne and Penzance. The proposal will greatly reduce the length of those car trips by providing a facility within the centre of Hayle. Not only will it reduce the length of car trips, the accessible location will also encourage walking and cycling as an alternative means to the car.
- 6.95 The traffic impact of the proposal is assessed against this context. Due to the site being adjacent to one of the main routes from the centre of Hayle to Penzance, the proportion of pass by trips is likely to be high. As such, the increase in traffic on Carnsew Road and on the A30(T) has been assessed to be acceptable.
- 6.96 The assessment has demonstrated that there will be adequate capacity in the proposed access junction to accommodate both the planned proposals at Hayle

Harbour (wider mixed use scheme) and the proposed foodstore traffic. The capacity of the existing roundabout at St Erths has also been assessed to have adequate capacity to accommodate all committed harbourside development traffic and the foodstore traffic.

- 6.97 Improvements to the pedestrian network will arise as a result of improvements to the pedestrian links between the site and Foundry Square. This will both increase pedestrian accessibility to the site and thereby reduce car trips and will also encourage linked trips between the proposals and the town centre. Pedestrian linkages will also be accommodated within the layout to provide future access to the South Quay site and connectivity to the public footpath. This involves the diversion of part of the public right of way through the site as shown on plan SP241-P07.
- 6.98 Adequate cycle parking and motorbike parking, in line with Cornwall County Council standards, will be provided for both staff and customers within the listed building.
- 6.99 In terms of public transport, the pedestrian links to the town centre will improve accessibility to existing public transport provision. The developer is also investigating the potential to provide a new bus stop on Carnsew Road closer to the store. This is subject to further discussions with Cornwall Council and public transport operators.
- 6.100 The servicing of the foodstore is proposed via a separate access onto Carnsew Road. The service yard has been designed specifically to accommodate the likely numbers and size of service vehicles required, including sufficient turning areas to allow vehicles to enter and leave the highway network in forward gear. The foodstore will be serviced by 16.5m articulated vehicles undertaking between 4 to 6 deliveries per day.
- 6.101 The delivery vehicles will access the site via an existing crossover of Carnsew Road and will arrive from the St Erths Roundabout directions (i.e. off the A30 south) to avoid the town centre.
- 6.102 The level of car parking provided within the proposal is in line with Cornwall County Council's maximum car parking standards. The proposal is considered to provide a balance between the need for adequate parking for the store and the need to encourage non-car borne trips to the site. Similarly, the car parking will allow for linked trips to be encouraged between the store and the town centre by allowing customers sufficient time to shop at both the proposed foodstore and to walk into the town centre to use the shops and services therein. The proposals are therefore

considered to comply with Policy TP12 of the Local Plan and the aims of PPG13 and regional guidance.

- 6.103 In summary, in highways terms, the proposal has been demonstrated to have an acceptable impact on the highways network. The site and proposal in its sustainable context will result in a significant reduction in carbon emissions due to the significant reduction in the length of existing car borne trips for food shopping by the residents of Hayle and encouraging a modal shift to more sustainable forms of transport by virtue of the accessibility of the site..

Other Material Considerations

- 6.104 In addition to the key issues examined above, there are other material considerations in relation to the proposals.

Economic Regeneration and Job Creation

- 6.105 The proposals will result in a significant economic regeneration benefit through both the recapture of the large amount of retail expenditure estimated to be lost from the Hayle economy (approx £15.4m per annum by 2012 - Source: PRS 2007).
- 6.106 During the likely build programme, up to 500 construction workers could be on the application site (with 100 on site at any one time). Once constructed the proposed Morrisons store will create approximately 250 new jobs which will comprise a wide variety of skilled and semi-skilled posts. As can be seen from the list below, the store would offer a range of job types. Morrisons is unique in the amount of food that is prepared in store by trained bakers, butchers and fishmongers, which results in a higher than average employment density for a foodstore.
- 6.107 The list below provides an indication of the types of posts that will be available to the local community within the store:

- § Senior Managers
- § Personnel Dept.
- § Systems Clerks (IT)
- § Administration
- § Cash Office (Accounts)
- § Meat Department (including a department manager and trained butchers)
- § Bakery Department (including a department manager and trained bakers)

- § Fish Department (including trained fishmongers)
- § Deli Counter
- § Oven Fresh Dept.
- § Grocery Dept (including a department manager)
- § Fresh Preparation
- § Fresh Foods (including a department manager)
- § Frozen Foods (including a manager)
- § Home and Leisure (including a department manager)
- § Warehouse (including trained fork lift truck operators)
- § Checkouts (including a checkout manager and supervisors)
- § Staff Canteen
- § Car Park
- § Cleaners
- § Kiosk

6.108 Morrisons will work with Cornwall Council to ensure that these new employment opportunities benefit local residents as far as possible. The Company will also use best endeavours to use local businesses during the construction of the new store.

6.109 Furthermore, the existing employment at Jewson will be retained through the relocation of the operation to a site within Hayle.

Residential Amenity

6.110 Residential amenity impacts will be low given the lack of juxtaposition with existing residential occupiers. The site is already in commercial use through the builders merchants. The proposal will result in a considerable improvement in the appearance of the site to the public benefit. The removal of the builders merchants will also result in the removal of noisy activity. Whilst the supermarket will generate greater levels of activity on the site, the levels of noise generated by customers using the site will not impact upon any residential properties.

6.111 There is currently a proposal for the adjacent site at 6 Carnsew Road for housing, on an employment site. If this were to be approved, residential premises would adjoin the service yard element of the proposals. However, the store is likely to generate only 4-6 service vehicles per day. Their relationship would not be dissimilar to the relationship to existing activities on the Jewson site, if the operation were to remain. In any event, planting will provide a visual buffer between the adjacent site and the service yard.

6.112 The proposals will generate additional traffic on the highways network which has an indirect impact upon general residential amenity. However, as set out within the TA, the percentage increase in activities on the roads will be within acceptable parameters.

Assessment against Policies EC10.1, EC17.1 and EC17.2 of PPS4: Planning for Sustainable Economic Growth

6.113 The accompanying PPS4 Impact Assessment Report assesses the proposals in terms of the sequential assessment and the impact upon the town centres. PPS4 also include a test for determining planning applications for economic development under Policy EC10.2. This states that all planning applications for economic development should be assessed against the following impact considerations:

- a) whether the proposal has been planned over the lifetime of the development to limit carbon dioxide emissions, and minimise vulnerability and provide resilience to, climate change;
- b) the accessibility of the proposal by a choice of means of transport including walking, cycling, public transport and the car, the effect on local traffic levels and congestion (especially to the trunk road network) after public transport and traffic management measures have been secured;
- c) whether the proposal secures a high quality and inclusive design which takes the opportunities available for improving the character and quality of the area and the way it functions;
- d) the impact on economic and physical regeneration in the area including the impact on deprived areas and social inclusion objectives;
- e) the impact on local employment.

6.114 Each of the above have been considered as part of the suite of documents which supports the application, including this planning statement. They are assessed in turn below:

EC10.2(a) and (b) - Carbon Dioxide Emissions, Climate Change and Accessibility

- 6.115 The development is proposed in an inherently sustainable location in terms of transport and energy use. The site is accessible by a variety of means of transport and will encourage modal shift compared with existing shopping patterns by virtue of its accessibility for both staff and customers through walking and cycling.
- 6.116 The proposal will re-use an existing building and a previously developed site in accordance with National Policy.
- 6.117 The materials for the new build will, in the main, be naturally sourced granite, slate and timber. These will be responsibly resourced, low maintenance and durable. Therefore they are inherently sustainable.
- 6.118 The building has been designed in order to minimise energy use through a high level of thermal insulation to mitigate energy loss. The roof lies out of the prevailing sun and wind in order to minimise solar gains.
- 6.119 Morrisons as the operator have active policies in place in order to avoid energy waste and employ Intelligent Building Services Systems to reduce their running costs and therefore energy consumption.
- 6.120 In the long term, the materials used will be durable. The building has been designed for flexibility for future uses and is therefore adaptable for change to accommodate future alternative uses.
- 6.121 The current estimated leakage of main bulk food shops from the main Hayle catchment area is estimated at being in excess of 70% (PRS, 2007). The PPS4 Impact Assessment estimates that the market share of Hayle will rise from 31% to 68% as a result of the proposals. The vast majority of shopping trips made by residents of Hayle are currently made by car (92.7% - PRS 2007) and, by virtue of the lack of opportunities for a main weekly bulk food shop within Hayle, are made to areas outside of the town. This results in unnecessary carbon emissions through lengthy car trips.
- 6.122 The proposals will result in a significant reduction in car trips outside of Hayle and will encourage a modal shift to more sustainable modes of transport by virtue of the accessibility of the site. The proposals will also conserve and enhance biodiversity

through the protection of the adjacent habitat and the improvement of habitats through the proposed landscaping scheme.

- 6.123 Therefore the proposal has been demonstrated to be accessible by a choice of means of transport and will limit carbon dioxide omissions by virtue of its sustainable location and the clawback / removal of the need for lengthy car trips to supermarkets outside of Hayle. Sustainable measures in the design of the building and its operation will also provide resilience to climate change.

EC10.2(c) - The need to provide high quality and inclusive design

- 6.124 The proposal has been demonstrated to have a high quality of design which will improve the character of the conservation area and the setting of listed buildings. In particular, it will also enhance the outstanding universal value of the World Heritage Site by virtue of the removal of the existing structures and the enhancement of the site in heritage terms, both through the design of the new building and the interpretation of archaeology within the landscaping.

- 6.125 The proposal promotes inclusive design through its accessibility and the attractive building and hard landscaped areas that will be created. Detailed consideration has been given to the car parking areas in order to harmonise the development with its setting. Improved linkages to the town centre and the considerable improvements to the attractiveness of the site and the public spaces that will be created ensures that the proposal will improve the character and quality of the area and the way it functions in accordance with the test under Policy EC10.2(c).

EC10.2(d) and (e) - Impact on economic and physical regeneration and local employment

- 6.126 The proposal will bring about new employment opportunities for Hayle without impacting upon existing employment within the town. The proposal includes the relocation of the Jewson operation so that no existing jobs will be lost from the site. The proposal is also anticipated to enhance retail vitality and viability within Hayle town centre without causing a detrimental impact in terms of the turnover of existing stores. As a consequence, by virtue of the appropriate scale of the retail provision, it is unlikely that jobs will be lost within the town centre within existing retail outlets.
- 6.127 The nature of the jobs created by the proposed operators are different in nature to those associated with other supermarkets given the emphasis on preparation of food

on site. The higher level of skills required in order to fill these roles will be a positive benefit to the local employment market.

- 6.128 The clawback of expenditure to Hayle that is currently lost, combined with the employment opportunities that will be presented during both the construction and operational phases, are such that the proposals will bring about an economic regeneration in the area and improve local employment opportunities. The physical regeneration proposed of this site has been demonstrated to be of benefit, given the significant improvements that can be made in terms of its contribution to local character. As such, the proposal satisfies the tests set out within Policy EC10.2(d) and (e).
- 6.129 In terms of the overarching tests set out within Policy EC10.2 of PPS4, it has therefore been demonstrated that these have been met.
- 6.130 It therefore follows that Policies EC17.1 and EC17.2 of PPS4 will be satisfied. EC17.1 states that planning applications for main town centre uses not in existing centres or not in accordance with an up to date development plan should be refused where it has not been demonstrated that Policy EC15 (sequential approach) or EC10.2 and 16.1 have not been met.
- 6.131 In this case, and as set out within the PPS4 Impact Assessment, EC15 has been satisfied as has EC16.1. As a consequence, EC17.2 allows the approval of the application given that no significant adverse impacts have been identified under either Policy EC10.2 or EC16.1.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This planning statement has been prepared by Savills on behalf of Actoris in order to support the full planning application for a proposed development of a new foodstore on land currently occupied by the Jewson builders merchants at Carnsew Quay, Hayle. This statement also supports the listed building application that accompanies the full application.
- 7.2 The statement examines the wide range of issues that need to be considered in relation to the proposals by bringing together the findings of the various technical and other supporting documents that have been produced to accompany the planning application. The various documents have been produced in order to address the planning policy tests and requirements set out at the national, regional and local levels.
- 7.3 It can be concluded that the proposals will deliver a sustainable form of development that meets the identified need for a step change in the retail provision of Hayle, whilst providing a sensitive form of development within the sites heritage and ecological context.
- 7.4 The positive impacts and key benefits of the proposal can be summarised as follows:
- § the provision of a much needed foodstore of an appropriate scale and location so as to claw back the significant amount of lost expenditure from the Hayle PCA, as supported by up to date retail studies;
 - § the proposals will bring about a significant regeneration benefit through the creation of the new supermarket and the spin-off benefits that the claw back of expenditure will have on the local economy and the vitality and viability of the town centre;
 - § the creation of a large number of jobs that will be accessible to the local population through providing a variety of skilled posts. The retention of the Jewson operation within Hayle will mean that the full benefit of the new jobs will be realised;
 - § the proposal provides an opportunity to greatly improve the character of the conservation area through the removal of the existing Jewson 20th century buildings and the creation of a carefully designed sensitive new structure

which has had regard to the World Heritage Site status of the area. The 'significance' of the heritage assets on site will increase as a result of the development - by virtue of their incorporation and/or preservation, becoming better revealed and improved interpretation (for public benefit);

- § archaeological features will be protected and enhanced through a series of initiatives on-site;
- § the preservation of the listed building will safeguard its long-term future and its setting will be greatly improved;
- § the ecological context of the site has been respected through careful design and will be enhanced through an appropriate landscaping scheme. Enhancements will be carried out in close consultation with the respective bodies;
- § the design of the new building and the renovation works to the listed building have been carefully considered and discussed with the Council and English Heritage. As such, the proposed development is designed so reference is made to local history through the form of the building and the materials used – and as a result, a new public place can be created, which respects and complements local heritage whilst providing a functional, inclusive and accessible retail location;
- § pedestrian links will be improved between the site and the town centre and public transport improvements are also being discussed with the Highways Authority;
- § a major benefit will be the creation of more sustainable shopping patterns through reducing the need to travel to out of centre locations and the potential to replace those trips with non-car borne modes of transport due to the accessibility of the site.

7.5 This statement has demonstrated that the proposals accord with and is supported by planning policy at national, regional and local level. The site represents the most appropriate location for the identified need for a new single large foodstore in Hayle. It will bring about significant regeneration benefits and protect the outstanding universal value of the World Heritage Site. This has the potential to act as a catalyst for further investment and improvements in the vitality and viability of the town centre.

7.6 This statement has therefore demonstrated that the planning permission and listed building consent sought can be granted subject to appropriate conditions and obligations.

APPENDIX 1

Demolition Plan

APPENDIX 2

Schedule of Materials

APPENDIX 3

Electronic Copy of PROW Definitive Map