



Sainsbury's Supermarkets Ltd and Cranford (Hayle) LLP
Land at Marsh Lane, Hayle
Proposed Foodstore

RETAIL ASSESSMENT

July 2010



WYG PLANNING & DESIGN

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1.0 INTRODUCTION

- 1.01 This Retail Assessment has been prepared by WYG Planning & Design in support of a planning application by Sainsbury's Supermarkets Ltd and Cranford (Hayle) LLP for the construction of a foodstore, and associated development on land adjacent to West Cornwall Shopping Park at Marsh Lane, Hayle. The application seeks planning permission for a new foodstore, car parking, petrol filling station, access and servicing as well as a nature reserve and associated highways works.
- 1.02 The applicants submitted a planning application for similar development on the site in November 2009. The application was withdrawn in February 2010 to enable the applicants to consider statutory consultation responses. The revised development forming the subject of this proposal seeks to address the matters raised previously.
- 1.03 The revisions to the application proposal include the following:
- New habitat surveys, including a winter bird survey
 - Improved ecology mitigation strategy
 - New S106 heads of terms covering: the construction of a footpath on Marsh Lane between Angarrack and the foodstore; contamination remediation of the commercial vehicle park; an offer to dedicate a re-configured County Wildlife Site (including the commercial vehicle park) to Cornwall Council together with funds for future management and initiatives to promote public access and provide visitor facilities
 - Improved layout that provides amongst other things, a bus stop on Marsh Lane close to the store entrance and a bus turning facility adjacent to the service yard
 - Improved front and side store elevations.
- 1.04 This statement provides an analysis of the retail planning considerations associated with the proposed foodstore development. It builds on the previous assessment and seeks to address the comments made by GVA Grimley their Assessment of Retail Planning Policy – Proposed Retail Stores at South Quay and Marsh Lane, Hayle, March 2010.

Context for this Report

- 1.05 The Government published the new PPS4 "Planning for Sustainable Economic Growth" in December 2009. PPS4 supersedes national planning policy on economic development in the previous PPG4 (1992) and for town centres as set out in PPS6 (2005). The document also replaces PPG5 and parts of PPS7. PPS4 sets out the key policies for assessing proposals for retail development.
- 1.06 For planning applications for main town centre uses in out-of-centre locations, Policy EC17 of PPS4 requires the following supporting evidence:
- A sequential assessment (detailed under Policy EC15)
 - An impact assessment (detailed under EC10 and EC16).
- 1.07 Accordingly, this report focuses on the policy tests set out in Policy EC17; it addresses Policy EC10, EC15 and EC16 of PPS4. Regard has also been had to the Practice Guidance published by the Department of Communities and Local Government (December 2009).
- 1.08 In producing this document, we have also had regard to development plan policy relating to major retail development. The statutory development plan consists of the following:
- Regional Spatial Strategy for the South West: RPG 10 (2001) (RPG10), albeit that this document is likely to be abolished following the recent change in Government
 - Cornwall County Structure Plan (2004) (CCSP)
 - Penwith Local Plan (2004) (PLP).
- 1.09 Relevant saved policies in these plans form the basis for considering the proposed development. National Planning policy guidance contained in PPS4 and emerging development plan documents are a material consideration.
- 1.10 The Cornwall Structure Plan identifies Hayle as a "main town". The town fulfils an important role as a centre for shopping, employment, community facilities, leisure and tourism. Adopted and emerging development plan policy encourages development proposals in such main towns that support their character, role and function as important service centres for the resident and local population.



1.11 Development should contribute to the range and choice of facilities on sites selected in line with the sequential approach. Such proposal should ensure a distribution of provision that also helps to reduce the need to travel and encourage non-car modes of transport. They should contribute to increased self-containment of important main towns, both in terms of employment and service provision.

Structure of Report

1.12 This assessment is structured as follows:

- Section 2 describes the application site and proposed development
- Section 3 reviews the findings of the Penwith Retail Study (2007)
- Section 4 assesses existing shopping patterns and provision in the study area
- Section 5 considers the sequential approach to site selection
- Section 6 assesses the impact of the proposed development against Policy EC10.1 and EC16.1 of PPS4
- Section 7 sets out the summary and conclusions.



2.0 THE SITE AND SURROUNDINGS

- 2.01 The application site comprises land principally to the east but also to the north and west of West Cornwall Shopping Park. It extends to about 13.89 ha and comprises a large area of undeveloped land which is bisected by an east to west running embankment associated with a dismantled railway line. A plan showing the site outlined in red is attached at **Appendix A**.
- 2.02 Hayle Industrial Park comprising large scale commercial sales uses is situated immediately to the south of the site on the south side of Marsh Lane. West Cornwall Shopping Park comprising a Marks & Spencer (including a Simply Food outlet), Costa Coffee, Next and Boots, with associated ground level car parking is situated immediately to the west. Extensive trunk road service facilities are located to the north of the application site, just beyond a small area of open land, which include a Premier Inn, a McDonald's restaurant, and a Brewers Fayre restaurant. A commercial vehicle park is situated to the east. Hayle Rugby Club is situated to the south west of the site. Land in the public highway on parts of Marsh Lane, Carwin Rise and the A30, including the Loggans Moor roundabout where highway improvements are proposed are included in the application site.



3.0 THE PROPOSED DEVELOPMENT

- 3.01 The proposal represents a comprehensive approach to the development of the entire application site, including a foodstore and associated development, a re-configured County Wildlife site and enabling highways works. The proposed site layout plan is attached at **Appendix B**.
- 3.02 A new Sainsbury's store is proposed in the south west corner of the site, measuring 4,983 sq m gross internal area and 3,042 sq m net sales area (2,129 sq m net convenience and 913 sq m comparison). The scheme includes a 317 space car park, service area and comprehensive landscaping, a new pedestrian link to Marsh Lane and the West Cornwall Shopping Park, 2 new bus stops and a bus turning facility on Marsh Lane.
- 3.03 The foodstore would be served by a new access off Marsh Lane, while the service yard would benefit from a separate access further along Marsh Lane to the east, just past the bus turning area. Two new bus stops, to the east and west side of Marsh Lane within easy access of the foodstore, will accommodate a new bus link to Hayle, to be provided by Sainsbury's. A new footpath between the foodstore and Angarrack would be constructed on the north side of Marsh Lane.
- 3.04 The remaining elements of the proposed development are described in detail elsewhere in the application submission. They include the creation of nature reserve through effective contamination remediation, ecological mitigation and management of land including the commercial vehicle park to the north and east of the proposed Sainsbury's store. The publicly accessible nature reserve will include an environmentally friendly boardwalk, bird hide, bat roost and interpretation boards, visitor car parking, the extension of existing and creation of new wetland areas and habitat enhancement, the protection of badger sets, grassland and reed beds. The applicants are offering to dedicate the land in its control (extending to about 10.85 ha) to Cornwall Council together with a financial contribution for future management.
- 3.05 The proposal includes significant highways improvements to Marsh Lane, Carwin Rise and the A30 Loggans Moor roundabout.

4.0 REVIEW OF THE PENWITH RETAIL STUDY

4.01 Published in December 2007, the Penwith Retail Study (PRS) was prepared by GVA Grimley LLP on behalf of the Penwith District Council as part of the emerging LDF evidence base. The PRS will eventually be updated by the Cornwall-wide retail study currently being undertaken by GVA Grimley, although at the time of writing this assessment, the updated study is not publicly available.

Methodology

- 4.02 The PRS defined a study area based on 8 main post code Zones. A household survey was undertaken in May 2007 by NEMS Market Research Ltd on behalf of GVA and ING Real Estate, based on a sample size of 800 usually resident people in order to calculate the levels of convenience and comparison expenditure flowing to stores and centres in the study area. The household survey would not therefore have identified the effect of visitor spend on shopping patterns in the study area, although the PRS made an allowance for visitor spend from outside the study area based on South West Tourism data (The convenience goods turnover of stores in Zone 3 was manually increased by 23%).
- 4.03 The PRS also undertook a full assessment of the vitality and viability of larger settlements in the former Penwith district, including Hayle and St Ives, using PPS6 health check criteria. WYG Planning & Design have subsequently updated the assessment for Hayle and St Ives, making reference to the PRS findings and indicators set out in PPS4.

Findings in Relation to Convenience Goods

4.04 Collectively, Hayle's convenience sector attracts £13.2m of expenditure from the study area, translating to a total convenience market share of about 32%, meaning that about 68% of locally generated convenience spend leaks to stores and centres outside Hayle. In terms of main food shopping, Hayle experiences significant expenditure leakage of about 72%, most of which flows to large foodstores in Penzance and Camborne. The turnover of Co-Op in Copperhouse is estimated to be £8.2m, Lidl's turnover is estimated to be £2.6m, with a further £1.9m spent in smaller stores in the town. Even for top-up shopping, Hayle is only able to retain about 48% (£3.0m) of available expenditure in Zone 3, although the PRS acknowledged that surveys of this type can underestimate the turnover of smaller convenience stores.

Findings in Relation to Comparison Goods

- 4.05 The PRS identified low retention rates for main food and comparison shopping expenditure. It found that Foundry and Copperhouse offer mainly local independent comparison shops, but are generally healthy with low vacancy rates. Hayle's comparison turnover is £4.4m, with out-of-centre facilities in the town turning over £1.1m. The best performing comparison sectors in Hayle are clothing and shoes, personal and luxury goods and recreational goods.

Findings in Relation to the Scope for New Development

- 4.06 At paragraph 6.25, the PRS acknowledges that *"...Hayle is the settlement in Penwith District which is in most need of a step change in retail provision and shopping patterns behaviour"*. It recognises that leakage occurs for both convenience and comparison shopping trips and taking into account public opinion, which supports improvements in retail provision in Hayle. The PRS recommends that there is an opportunity to increase Hayle's market share for both convenience and comparison retailing.
- 4.07 The PRS identified two alternative scenarios for the likely amount of new convenience floorspace required in Hayle at 2012 and 2016 to support the expenditure potential of the usually resident population. The first was a scenario whereby the market share of Hayle remains constant up to 2016; the second (and the approach recommended by the PRS) assumed that Hayle will increase its market share, referred to as the 'revised market share approach'. The revised market share approach takes account of the potential impact of the proposed M&S Simply Food and the extension to Lidl, neither of which were trading at the time of the PRS survey.
- 4.08 The PRS (paragraph 6.26) states that *"On the basis of a potentially realistic market share of 70% retention of convenience shopping trips..."*, there is the potential for up to 1,500 sq m net of additional convenience floorspace by 2012, up to 1,600 sq m net in 2016 and up to 1,750 sq m net by 2021. In monetary terms, this equates to £15.4m in 2012, £16.9m in 2016 and £18.8m in 2021. The PRS suggested that this need could be met by a new supermarket capable of retaining main food shopping trips in the town.
- 4.09 In terms of comparison goods, and again based on an increased market share approach, the PRS identifies the potential for up to 2,200 sq m net by 2012, up to 2,900 sq m net by 2016 and up to 4,000 sq m net up to 2021. Based on the PRS-assumed comparison goods sales density of £5,000 per sq m in 2007 (paragraph 5.29), this equates to expenditure capacity of



£11.0m in 2012, £14.5m in 2014 and £20.0m in 2021.

Potential Development Sites

- 4.10 The PRS commented on the potential sites to accommodate new retail development. It supported retail development at the Harbourside as part of a wider land-use mix, provided it can be closely integrated with Foundry and subject to further consideration of the location, scale and type of facilities proposed. However, the PRS stated that it would be very important to ensure proposals on the Harbourside did not harm Copperhouse and that it would be necessary to consider how the level of identified need could be spread across both centres (section 7 page 101).
- 4.11 In terms of sequential sites, the PRS ruled out Beatrice Terrace and Copper Terrace, which are close to Copperhouse. The PRS also concluded that sites around the Loggans Moor roundabout including the Sainsbury's application site at Marsh Lane, were not preferred locations for retail development, but significantly the PRS recognised that if PPS6 policy can be met, there may be benefits in locating additional retail provision adjacent to the West Cornwall Shopping Park.
- 4.12 The PRS recommended that a detailed strategy be prepared for Hayle, taking into account the Harbourside regeneration scheme and the challenge of ensuring that retail development in one centre does not harm the other.

Summary

- 4.13 The PRS recommended a step change in retail provision in Hayle as part of its revised market share approach. It then assessed the quantitative need for new convenience floorspace to be up to 1,500 sq m net at 2012, and up to 1,600 sq m net by 2016. This is based on the claw back of a significant proportion of the retail expenditure currently being lost to competing facilities in Camborne and Penzance and a convenience market share of 70%, compared to a current retention rate for main food shopping expenditure of about 28%. It is suggested that this could be met by a new supermarket capable of retaining a greater proportion of main food shopping spend.



5.0 EXISTING SHOPPING PATTERNS AND PROVISION IN THE STUDY AREA

5.01 This section of the assessment describes the general shopping provision and patterns in Hayle and the surrounding area. The sub-regional shopping hierarchy is considered, with reference to relevant development plan policy. Building on the shopping patterns identified in the PRS, the results of the household survey commissioned by the applicant area assessed as a means of setting out existing shopping patterns in Hayle and the surrounding area. The results then inform the extent of the catchment area of Hayle and the proposed development. In light of the nature of the proposed development, the section concludes with a description of the primary convenience retail facilities in Hayle and the surrounding area.

Sub-Regional Context

5.02 Policy 25 of the Cornwall County Structure Plan (2004) recognises Hayle as being a main town. It requires that development should be in, or well integrated with such towns and support their role and function in meeting the needs of their own populations and surrounding areas. Such development should contribute to a reduction in the need to travel.

5.03 Camborne and Penzance are identified as Strategic Urban Centres. St Ives, Helston and Hayle are identified as main towns and Penryn a Local Centre. A plan identifying the spatial settlement hierarchy identified in the Structure Plan in west Cornwall is included at **Appendix C.**

5.04 At the local level, Policy TV-1 of the PLP states that development in the district will be focused on the towns of Penzance, Newlyn, St. Ives, including Carbis Bay, and Hayle. A lower scale of development will be accommodated in the main villages of the district set out in the policy. 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.

5.05 The retail hierarchy and role of centres is set out in paragraphs 7.3.43 – 7.3.47 and Policy TV-16 of the PLP. The plan recognises the dominant regional role of Truro in Cornwall. Penzance is acknowledged as a second tier centre in Cornwall and the dominant main town



- 5.06 in the district. Hayle sits alongside St Ives as important main towns and local centres in the district hierarchy, fulfilling an important role in serving the needs of the local resident and surrounding population.
- 5.07 Policy TV-16 of the plan provides that major retail, office, entertainment, leisure or community development should be located in the town centres of Penzance, St Ives and Hayle. Such development will be permitted in out-of-centre locations where all potential town and edge-of-centre sites have been discounted in line with the sequential approach to site selection.
- 5.08 In summary, Hayle is therefore a 2nd tier settlement in Cornwall and an important main town in the district. Its role and function is to meet all the needs of local population. The town should be the focus for new development in line with this role and function.

Existing shopping patterns

- 5.09 WYG Planning & Design instructed NEMS Market Research Ltd in April 2009 to undertake a new household survey of the identical survey area and Zones used in the PRS. A map of the Zones is included at **Appendix D**. Based on the household survey area used in the PRS and undertaken in April 2009, the survey provides up to date shopping patterns in Hayle and the surrounding area and takes into account the West Cornwall Shopping Park and the extension to Lidl in Hayle.
- 5.10 The WYG household survey asked respondents a variety of questions to establish current convenience shopping patterns in the study area. It also asked further questions to establish additional facts about what respondents like and dislike about their preferred main food shopping destination, their propensity to undertake linked shopping trips, rates of visitation to the West Cornwall Shopping Park and whether they would use the new Sainsbury's and their current top-up stores. The responses are examined in the following sections.

Convenience Shopping Patterns

- 5.11 Based on the tabulation by Zone identified in the WYG household survey results at **Appendix E** and the statistical tables at **Appendix F**, Figure 4 below summarises the headline shopping patterns in percentage terms for Zones 2 and 3 identified from the WYG household survey.

Figure 5.1: Shopping Patterns in Zones 2 and 3

Destination	Zone 2			Zone 3		
	Main Food (%)	Main Other (%)	Top-up (%)	Main Food (%)	Main Other (%)	Top-up (%)
Co-Op Hayle	1.0	2.0	3.0	16.0	16.0	44.0
Others, Hayle	0.0	0.0	0.0	1.0	1.0	7.0
Hayle town centres – Sub-Total	1.0	2.0	3.0	17.0	17.0	51.0
Lidl, Hayle	2.0	9.0	3.0	10.0	15.0	14.0
M&S Simply Food, West Cornwall Shopping Park	2.0	12.0	3.0	1.0	12.0	4.0
St Ives town centre	6.0	8.0	54.0	0.0	0.0	2.0
Tesco Carbis Bay	60.0	11.0	30.0	3.0	1.0	2.0
Total	71.0	44.0	93.0	31.0	45.0	73.0

Source: WYG Household Survey

- 5.12 Question 1 asked respondents where they undertook their main food shopping. Overall, Zone 2 (St Ives) retains about 71% of its main food shopping spend, with Tesco Carbis Bay being the most popular store for main food shopping provision, with a main food market share of 60% in Zone 2. St Ives town centre holds a slim market share (6%). M&S Simply Food, Lidl, Carwin Rise and Co-Op Copperhouse also attracted a modest level of main food trade from Zone 2 (3% each). Hayle town centre (Foundry and Copperhouse combined) and M & S Simply Food each attract about 1% of main food shopping trade from Zone 2.
- 5.13 In Zone 3 (Hayle), where the Sainsbury's foodstore is proposed, the level of main food shopping retention is much lower than Zone 2 at about 31%. The market share of Hayle town centre for main food shopping is about 7%; Co-Op in Copperhouse accounts for nearly all of this. The out of centre Lidl Hayle, attracts 10% of main food expenditure originating in Zone 3, with 3% being spent in Tesco Carbis Bay.
- 5.14 Question 10 asked whether there are any other stores used by respondents for main food

shopping. M & S Simply Food and Lidl Carwin Rise were the main beneficiaries of “main food other” trade compared to main food trade, with M & S Simply Food attracting 12% of main food other trips originating in Zone 3 (compared with 1% of main food trips) and Lidl attracting 15% of main food other trips compared with 10% of main food trips.

- 5.15 Question 13 sought to establish top-up shopping patterns. In Zone 3, St Ives Town Centre (54%) is the most popular destination, with Tesco Carbis Bay (30%) also proving popular. For top-up shopping, Hayle has a market share in Zone 3 of 51%. Co-Op’s top up market share in Zone 3 is 44%.
- 5.16 Figure 5 below identifies the broad pattern of main food shopping expenditure being spent in stores outside Zones 2 and 3.

Figure 5.2: Main Food Convenience Shopping Patterns for Stores Outside Zones 2 and 3

Store	Proportion of Main Food Convenience Expenditure originating in Zone 3 Hayle (%)	Distance from Hayle (Miles)
Tesco, Camborne	24	6.5
Morrison, Penzance	18	7.0
Tesco, Penzance	14	7.0
Morrison, Pool	4	8.5
Asda, Falmouth	1	20
Tesco Helston	1	16
Tesco, Tolgus Hill, Redruth	1	10.2
Tesco Extra, Station Road, Redruth	3	8.3
TOTAL	66%	Na

Proportion of trade derived from WYG household survey

- 5.17 Ignoring internet/house delivery and trips to specialist town centre retailers such as Iceland, the headline figure is that about 66% of spend originating in Zone 3 is spent in main food shopping destinations outside Zones 2 and 3. Tesco Camborne draws 24% of main food



and 13% of main food other spend originating in Zone 3. Morrison (18%) and Tesco Penzance (14%) both attract significant levels of main food trade from Zone 3. These shopping patterns involve a 14-mile round trip to Penzance and a 13 mile round trip to Camborne. Tesco operates five of the eight stores identified in Figure 5 and Morrison operates two stores.

Other Shopping Preferences and Patterns

- 5.18 Question 4 of the WYG household survey asked about the main reasons why shoppers chose their main food shopping destination and offered a range of options to choose from. Across the study area as a whole, the most popular reason (58% of respondents) given was because the store is convenient for home. In Zone 3 (Hayle), 42% of respondents gave this answer, with lower prices (26%), quality of goods (14%) and range of goods (15%) also proving to be popular reasons. In Zone 2, 62% of respondents identified the convenient to home reason, which is a significant difference to Zone 3. This difference could be as a result of Tesco Carbis Bay in Zone 2, whereas Hayle residents in Zone 3 do not have a genuine main food shopping destination in the town.
- 5.19 Question 7 answers confirm that across the study area, 87% of respondents travel to their preferred main food store either as a driver or a passenger in a car or van. The figure for Zone 2 is 84% and 87% for Zone 3.
- 5.20 Question 15 asked whether respondents would be likely to use the proposed Sainsbury's in preference to their existing main food destination. Across the study area as a whole, 44% of respondents said they would be very or quite likely to use the Sainsbury's in preference to their existing destination. Comparable figures for Zone 1 are 59%; 69% for Zones 2 and 3; 55% for Zone 4; 53% for Zone 5; 56% for Zone 6; 26% for Zone 7 and 20% for Zone 8.
- 5.21 Question 15 asked those respondents who undertook their top-up shopping in Hayle if they would continue to do so if a new Sainsbury's opened at Marsh Lane. 77% of Zone 2 respondents and 54% of Zone 3 respondents said they would be very likely or quite likely to do so. 32% of Zone 2 respondents and 32% of Zone 3 respondents said they would be unlikely or very unlikely to use their existing top up destinations if there was a new Sainsbury's.
- 5.22 As noted above, question 17 of the WYG household survey asked respondents whether they visit the West Cornwall Shopping Park. Visitation rates were very high across the entire



study area. In total, 53% of all respondents indicated they visit the Shopping Park at least once a month. In Zone 1, almost 49% of respondents visit the Shopping Park at least once a month. Comparable figures are 61% in Zone 2; 73% in Zone 3; 47% in Zone 4; 56% in Zone 6; 17% in Zone 7 and 31% in Zone 8.

- 5.23 Question 18 then asked those respondents who visit the Shopping Park whether they would be likely to combine this with a visit to a new Sainsbury's at Marsh Lane. Overall, 80% of respondents across all 8 Zones indicated that they would be likely to do this. In Zone 1, 79% confirmed they would link a trip with the new Sainsbury's. Comparable figures are 83% in Zone 2; 78% in Zone 3; 81% in Zone 4; 83% in Zone 5; 95% in Zone 6; 67% in Zone 7 and 64% in Zone 8.

Summary

- 5.24 In summary, a significant proportion (66%) of convenience retail expenditure generated in the Hayle area (Zone 3) is currently being spent at competing facilities outside the area. Large out-of-centre foodstores such as those in Camborne and Penzance cater for main food shopping trips, and are conveniently located to attract customers from Zone 3 Hayle. Such a high level of leakage indicates that the current convenience retail provision in Hayle is failing to meet the main food shopping needs of its catchment population. In turn, it is unsustainable in terms of the length of shopping trips and contrary to prevailing policy that supports efficient and competitive retail sectors providing sufficient consumer choice locally.
- 5.25 It is clear from the household survey results that the West Cornwall Shopping Park has a very strong attraction locally and throughout the wider study area. The addition of a bulk main food shopping facility such as the proposed Sainsbury's store on the application site has the potential for a significant number of linked trips to the retail park.

The Study Area

- 5.26 The study area referred to throughout this assessment includes the 8 Zones set out in the PRS survey area. As noted above, this area (shown at **Appendix D**) formed the basis of the WYG household survey.



Primary Catchment Area

- 5.27 The primary catchment area (PCA) is the area from which the proposed Sainsbury's would be likely to draw most of its trade and within which a significant proportion of people will look to the proposed store, alongside others in the study area, for their main food shopping activities. Based on the findings of the WYG household survey, the PCA for the proposed Sainsbury's is considered to be Zones 2 and 3 in the study area. Zone 2 includes St Ives and its hinterland and Zone 3 covers Hayle and its hinterland.
- 5.28 Zones 2 and 3 therefore form the focus for this assessment as the primary catchment area for the proposed development.

Existing Shopping Provision

- 5.29 A detailed vitality and viability assessment of Hayle Town Centre is set out at **Appendix G**, carried out as an update of the PRS findings and taking account of PPS4 indicators.
- 5.30 Overall, the two areas of Hayle Town Centre, Foundry and Copperhouse, are considered to be both vital and viable when assessed against PPS4 indicators. Hayle has a good range of independent convenience and comparison goods retailers, vacancy levels below the national average in Foundry and Copperhouse, and good levels of pedestrian footfall.
- 5.31 Having regard to the application proposal, the main convenience retailer in the town centre is the Co-op, Copper Terrace. The store is complemented by Premier, Spar and McColls together with a range of local independent shops.

Co-op, Copper Terrace, Hayle (995 sq m net)

- 5.32 Situated off Copper Terrace and extending to approximately 995 sq m net sales area, the Co-op is the dominant convenience retail facility in Hayle Town Centre (Copperhouse). Recently refurbished, the store offers 7 checkouts and a good quality internal shopping environment. The WYG survey observed that the store has a clean, modern and fresh interior with a good display of goods and good levels of stocking. It is estimated that 95% of the Co-Op's net sales floorspace is dedicated to the sale of convenience goods, providing a medium range of everyday goods and essentials. The store has approximately 150 car parking spaces, and provides free car parking for up to two hours. There is also a bus stop close to the entrance. Busy at the time of survey, the store caters principally for the top up

and, to a lesser extent, main food shops.

Out-of-Centre Facilities in Hayle

Lidl, Carwin Rise, Hayle (1,407 sq m net)

- 5.33 Lidl is located on Carwin Rise, just off the A30 Loggans Moor Roundabout. The store was recently extended from 871 sq m to 1,407 sq m of which 80% is estimated to be for the sale of convenience goods. The modern store offers a good shopping environment in a typical Lidl format. It sells a range of deeply discounted convenience products. The store functions predominantly as a niche top-up shopping destination, as well as a part main food shopping function. Stocking levels were high and trading levels good at the time of survey.

West Cornwall Shopping Park, Hayle

- 5.34 West Cornwall Shopping Park opened in September 2006 and occupies a highly prominent location fronting the A30 and takes its access directly off the A30 at Loggans Moor roundabout via Marsh Lane. It is a modern high quality development that has a gross retail area of about 6,332 sq m and includes four retail units: two 929 sq m net units which are operated by Next and Boots; a M&S store (including a Simply Food store) with a net sales area of about 2,601 sq m and a Costa Coffee outlet, which extends to about 102 sq m. The park is distinctive as it is the only retail park in Cornwall that accommodates M&S (including a Simply Food), Next and Boots. There are about 200 free surface level car parking spaces within the development.
- 5.35 The nature of the retail park is reflected in its attraction to shoppers across the study area identified in the household survey. In total, 53% of all respondents indicated they visit the Shopping Park at least once a month. In Zone 1, almost 49% of respondents visit the Shopping Park at least once a month. Comparable figures are 61% in Zone 2; 73% in Zone 3; 47% in Zone 4; 56% in Zone 6; 17% in Zone 7 and 31% in Zone 8. Given its location, it would also be reasonable to assume that the West Cornwall Shopping Park also draws significant levels of trade from outside the study area. This evidence suggests that the retail park is a retail destination of county-wide significance and it functions as a *de facto* centre.
- 5.36 In terms of convenience retail, the M&S store has a large food retail area extending to approximately 465 sq m. It provides a high quality shopping environment. The high quality food offer is typical of the M&S format. The store caters principally for top-up shopping. The



store was observed to be trading well at the time of survey.

St Ives

5.37 Underpinned by tourism, St Ives Town Centre contains a variety of national multiples and local independent traders providing a good range of high quality comparison and convenience outlets. The centre has low vacancy rates and is considered to be very healthy when assessed against PPS4 indicators.

5.38 The Co-op and substantial facilities in St Ives Town Centre are described in the following paragraphs.

Co-Op, Chapel Street, St Ives (170 sq m net)

5.39 The store is located on Chapel Street opposite the cinema and Western Hotel, which is within the town centre immediately outside prime shopping area. The interior of the store was well maintained, however the exterior appeared tired. The store offers 3 checkouts and a limited range of convenience goods, fulfilling a basket shopping function. It is estimated that 95% of the floorspace is used for convenience goods and the remaining 5% is used for a selection of comparison goods including predominantly seasonal goods (BBQs and picnic equipment). The store was very busy at the time of survey.

Co-Op, Tregenna Place, St Ives (260 sq m net)

5.40 The Co-Op is located on Tregenna Place which is within the prime shopping area of St Ives Town Centre. The in-store environment is of good quality, albeit that the external appearance of the store would benefit from some improvement. The small store has 3 checkouts and provides a limited range of predominantly convenience goods, fulfilling a top-up food shopping function. It is estimated that 95% of the floorspace is used for convenience goods, with the remaining 5% used for a selection of seasonal comparison goods offer (e.g. BBQs, picnic equipment etc). There was also a small DVD/book offer. The store was trading strongly at the time of survey.



Out-of-Centre Retail Facilities in St Ives

Co-op, Higher Stennack, St Ives (234 sq m net)

- 5.41 Located off Higher Stennack, the small store benefits from an open frontage onto the main road network. There is a small area of unrestricted free car parking in front of the store. The facility offers 3 checkouts and a limited range of convenience goods, fulfilling a basket shopping function. It is estimated that 95% of the floorspace is used for convenience goods and the remaining 5% is used for a selection of comparison goods including predominantly seasonal goods (BBQs and picnic equipment). The store was very busy at the time of survey.

Tesco St Ives Road, Carbis Bay (1,197 sq m)

- 5.42 Tesco is located in Carbis Bay which lies between Hayle and St Ives, in an out-of-centre location. The store extends to 1,578 sq m net sales and is the largest such facility in either St Ives or Hayle. The store benefits from high quality and modern interior décor and provides a good quality shopping environment. The store has a total of 16 check outs and incorporates an in-house bakery, delicatessen, café (Costa) and hot delicatessen counter. It provides a medium range of convenience goods across approximately 95% of the sales area. 15% of the area is given over to the sale of a restricted range of comparison goods, including CD's, kitchenware, electrical including TV's, microwaves, irons and toasters, stationary and mobile phones. The facility fulfils a bulk main food shopping function and was trading well at the time of survey.

Other Out-of-Centre Convenience Retailing in the Study Area

- 5.43 Based on the convenience shopping patterns identified by the WYG household survey, it is appropriate to assess the following stores as they draw large amounts of expenditure from Hayle.

Tesco, Wesley St, Camborne (1,570 sq m net)

- 5.44 The Tesco, Camborne is located about 6.5 miles east of Hayle and has a net sales area of 1,923 sq m. The store was well presented internally with a good display of goods. The store has 18 checkouts and approximately 90% of the stores sales area was given over to the sales of a wide range of convenience goods and specialised services include a bakery,



delicatessen, hot food counter and a photo processing facility. The ancillary range of comparison goods included a limited number of electrical items, mobile phones, garden furniture and goods, DIY, DVD's and CD's and some clothing goods. The store benefits from a large customer car park and 12 pump petrol filling station. The store caters for a bulk main food shopping function and was trading strongly at the time of survey.

Morrisons, Penzance (2,657 sq m net)

- 5.45 The out-of-centre Morrisons in Penzance is located approximately 7 miles to the south west of Hayle, adjacent to the A30. The store offers a good quality shopping environment, with modern displays and interior décor. There are a total of 17 checkouts, an in-house fish counter, butcher, bakery, delicatessen, café, hot food counter, photo processing, dry cleaning and glass rental service. Approximately 85% of the sales area is dedicated to the sale of convenience goods, providing a full range bulk main food shopping offer. The comparison goods offer includes a range of electrical goods, toys, garden and homeware, stationary, kitchenware, DVD's and CD's. It has a large car park and 12 pump petrol filling station. The store fulfils a main food shopping function and was trading strongly at the time of survey.

Tesco, Penzance (1,705 sq m net)

- 5.46 The out-of-centre Tesco in Penzance is located approximately 7 miles south west of Hayle. Operated on a 24 hour basis, the store provides a modern shopping environment. There are a total of 20 checkouts and specialist in-store services include a butcher, fish counter, bakery, delicatessen, photo processing facility and a café. Approximately 90% of the sales area is dedicated to the sale of convenience items. Comparison goods sold at the store include a limited range of electrical items, mobile phones, kitchen and homeware, DIY, car accessories, seasonal goods, some clothing, CD's/DVD's and books. There is a large customer car park and 12 pump petrol filling station. The store caters for a main food shopping function and was trading strongly at the time of survey.

Summary

- 5.47 This section has identified the role and function of Hayle as an important main town in the district and sub-regional shopping hierarchies. The centre fulfils an important function in servicing the needs of the local resident and surrounding populations. Consistent with the PRS and based on the results of the household survey, the primary catchment area for Hayle



and the proposed development consists of Zones 2 and 3 of the household survey area.

- 5.48 Overall, both Foundry and Copperhouse town centres in Hayle are considered to be both vital and viable when assessed against PPS4 indicators. They offer a good range of independent convenience and comparison goods retailers, vacancy levels below the national average and good levels of pedestrian footfall. Underpinned by tourism and very busy at the time of survey, St Ives has a high quality comparison goods offer. It contains a variety of national multiples and local independent traders, with low vacancy rates and is considered to be very healthy when assessed against PPS4 indicators.
- 5.49 Existing convenience retail provision in Hayle is restricted to the Co-op at Copper Terrace and out-of-centre Lidl store. This restricted provision and the absence of a bulk main food shopping facility is currently resulting in a significant proportion of convenience goods retail expenditure leaking out of the area as consumers travel to competing facilities further afield (including Penzance and Camborne in particular) to do their bulk main food shopping. The proportion of retail expenditure lost to facilities outside of Hayle is higher in the comparison goods sector.



6.0 SEQUENTIAL SITE ASSESSMENT

Policy Context

6.01 Policy EC14.3 of PPS4 confirms the requirement for applicants to undertake a sequential site assessment for applications involving main town centre uses that are not in an existing centre and are not in accordance with an up to date development plan. As previously noted, the application site is situated in an out of centre location and the proposal is not in accordance with an up to date development plan. Accordingly, a sequential site assessment is required by PPS4 and is set out in the following paragraphs.

6.02 This sequential site assessment meets the requirements of Policy EC15 of PPS4 and takes into account the accompanying Practice guidance.

Area of Search: Sequential Sites Scoping

6.03 PPS4 requires local planning authorities to allocate sufficient sites to meet the identified need for at least the first five years from the adoption of their development plan documents. Since only limited progress has been made on the LDF, no site allocations for main food shopping destinations have been made to serve the needs of Hayle. Accordingly, it was necessary to agree the sites to be considered by the assessment with Cornwall Council.

6.04 Cornwall Council confirmed by letter dated 10 July 2009 (copy at **Appendix H**) that the sequential assessment should consider the following sites.

1. Hayle Harbourside South Quay
2. Hayle Harbourside North Quay
3. Jewson
4. Jewson and South Quay combined
5. R & J Supplies
6. Loggans Moor
7. Hayle Rugby Club

6.05 This schedule of sites forms the basis of the sequential site following assessment. A plan detailing the location of each of the identified sites is included at **Appendix I**, together with aerial photographs and extracts from the Penwith Local Plan proposals map for each site.



- 6.06 These sites are all located in and around Hayle, recognising that Hayle is the area of search, being the settlement where a step change in convenience and comparison shopping provision is required.

Need Being Met by the Application Proposal

- 6.07 Although need is no longer a PPS4 policy test, it is one of the relevant considerations in applying the sequential approach in terms of providing a guide to the size of site required to accommodate a particular scale of foodstore and car park.
- 6.08 The PRS identified the need for a step change in Hayle's convenience and comparison offer and suggested that this could be delivered by a new supermarket capable of retaining a greater proportion of main food shopping spend. The PRS identified the quantitative need for new convenience floorspace to be up to 1,500 sq m net at 2012, and up to 1,600 sq m net by 2016.
- 6.09 As noted above, this assessment considers that a larger foodstore is required to meet the need identified by the PRS for a step change in Hayle's retail offer and that a foodstore of the size proposed by Sainsbury's is required.
- 6.10 As noted above, the Sainsbury's foodstore has a gross internal floor area of 4,983 sq m, a net sales area of 3,042 sq m and 317 car parking spaces and it is considered that this represents an appropriate scale of development required in order to meet the genuine need for a main food shopping destination to serve Hayle.
- 6.11 During its site search, Sainsbury's considered a series of sites in Hayle, including sites on the Harbourside and found none of them to be suitable to meet the need identified in the PRS. The absence of suitable sites in or on the edge of Foundry or Copperhouse led Sainsbury's to consider other out of centre sites including Hayle Rugby Club, and it was as a result of this process that it selected the Marsh Lane site.

Flexibility

- 6.12 PPS4 requires retailers to demonstrate flexibility in their business model in considering sites in or on the edge of centres in terms of scale, format and car parking (PPS4 EC15.1 (d) and Practice guidance paragraph 6.27). These are considered below:



Scale

- 6.13 Sainsbury's does not operate a fixed-format business model requiring a specific store size or range of store sizes. Its newer stores are bespoke and store sizes therefore vary from place to place. In these circumstances, it would theoretically be possible to reduce the store size and number of parking spaces. However, as stated above, a materially smaller store selling purely convenience goods would be unlikely to make adequate provision for main food shopping and the modest level of complementary non-food shopping now expected by customers and would be likely to fail to address the existing levels of expenditure leakage as a result. Accordingly, this assessment is undertaken on the basis of a requirement to find a site of around 2.0 ha to accommodate a foodstore, servicing and car parking (excluding land required for the petrol filling station).

Format

- 6.14 Sainsbury's recognises the potential to operate multi-level and other store configurations on smaller footprints in appropriate locations. While it is helpful that the Practice guidance identifies Cambridge and Halesowen as examples of this type of retail development, it should not be assumed that such solutions will automatically be acceptable in other settlements. In particular, it is considered that a multi-level retail development would be unsuitable on Hayle Harbourside because of the significant heritage constraints affecting each of the Harbourside sites. This comment is justified in the context of heritage consultation responses on the now withdrawn ING foodstore application on South Quay.

Car Parking

- 6.15 The availability of free ground level parking combined with relative ease of access off the main highway network is likely to be one of the reasons why foodstores in Camborne and Penzance attract many customers who live in and around Hayle.
- 6.16 The number of parking spaces and the configuration of the car park in the proposed Sainsbury's foodstore take into account the need to compete effectively with foodstores in Penzance and Camborne as well as the location close to the A30 and the West Cornwall Shopping Park.

Consultation Response by GVA Grimley

- 6.17 GVA Grimley prepared a consultation response (March 2010) on the November 2009 Retail Assessment submitted by WYG in connection with the withdrawn application, that included a commentary on the sequential approach. Cornwall Council had previously set out its comments by letter dated 11 January 2010. This assessment includes a revised sequential site assessment that takes these comments into account.
- 6.18 GVA recognises that the Harbourside sites are "... *in principle*' sequentially preferable..." (GVA paragraph 4.14) to the Marsh Lane site but that ultimately, other factors will determine whether the Harbourside sites are indeed sequentially preferable.
- 6.19 GVA and the Council considered that the WYG sequential site assessment did not include a sufficiently detailed assessment of the heritage implications of a foodstore development on any of the Harbourside sites. These comments have been addressed and the revised application is accompanied by an independent Heritage Impact Assessment that concludes very clearly that none of the Harbourside sites are suitable to accommodate even a modest foodstore because of the impact on the Outstanding Universal Value (OUV) of the World Heritage Site (WHS). If the Council accepts this, then GVA recognises that the Sainsbury's site has the potential to meet the sequential approach (GVA paragraph 4.14).
- 6.20 Other matters raised by both organisations relating to WYG's assessment of the Jewson and South Quay sites have largely been overtaken by events relating to the submission of the foodstore application on the Jewson site and the withdrawal of the ING foodstore application.

Main Conclusions of the Heritage Impact Assessment

- 6.21 The Heritage Impact Assessment referred to above is included at **Appendix J**. In general terms, the Heritage Impact Assessment concludes that none of the potentially sequential sites identified by the Council on the Harbourside are considered suitable to accommodate a foodstore and ancillary parking and servicing because as a matter of principle, a foodstore would not constitute heritage-led development, even if it would secure some heritage benefits. This would make such a development completely at odds with the statutory requirement to preserve OUV.
- 6.22 A supermarket building would be significantly out of scale in footprint and mass with any



historic structures and with any existing building in the area.

- 6.23 The Assessment goes on to consider the individual Harbourside sites identified by the Council and these are addressed in more detail in the sequential assessment below.

Sequential Site Assessment

- 6.24 An assessment of the sites identified by Cornwall Council is set out below, using the criteria set out in the PPS4 Practice guidance.

South Quay

Description

- 6.25 South Quay is in an edge of centre location to the west of Foundry town centre and extends to about 3.4 ha. It is a highly visible narrow promontory of land extending into the harbour. The site is allocated for mixed use development under Policy TV-D of the Penwith Local Plan. It is identified in the draft Hayle AAP as a Potential Development Site (H1) for mixed use development including retail development that is located in close proximity to the defined shopping areas at Penpol Terrace and Foundry Square.
- 6.26 South Quay is located within the Cornwall and West Devon Mining Landscape WHS, the Hayle Conservation Area, is surrounded by the Grade II listed harbour wall and is adjacent to a SSSI.

Availability

Policy Pre-Conditions

- 6.27 The site is allocated for comprehensive mixed use development under Policy TV-D of the Penwith Local Plan. There are significant heritage-related pre-conditions to development of South Quay, relating specifically to the requirement for heritage-led development, the repair of the listed harbour walls and the retention of the slipways as well as the scale, massing and form of development and its impact on views from a number of locations.

Ownership

- 6.28 It is understood that the site is owned by ING (Red) UK Ltd, the development arm of ING Bank Plc and it is assumed that South Quay is available for foodstore development.



Suitability

- 6.29 ING previously submitted and withdrew (in the face of a likely refusal recommendation) an application for a stand-alone foodstore with ancillary car parking on South Quay. Such a form of development was considered inappropriate by the statutory heritage consultees and the Council. An initial draft committee report prepared by planning officers for this foodstore application is included at **Appendix K**.
- 6.30 Particular consideration would need to be given to building scale, height and massing of the foodstore, the design of the car park and service area and pedestrian access to the waterfront.
- 6.31 The Heritage Impact Assessment concludes that South Quay is a very sensitive site that makes a major contribution to OUV. A foodstore would impact on the historic openness of the quayside and blight views in all directions to the extent that a foodstore "*...would disfigure the historic environment in a fundamental way and distort its reading and interpretation.*"
- 6.32 If a foodstore development (whether it is on South Quay, Jewson or a combination of these sites) cannot reinstate the sensitive historic features such as the slip-ways, walls and docking areas for whatever reason, the clear conclusion must be that it is not an appropriate form of development. The withdrawn ING application did not achieve this and it remains to be seen whether a revised application will be submitted that overcomes this concern.
- 6.33 In flood risk terms, 29% of South Quay is in flood Zones 2 or 3 compared with 14% for Marsh Lane, meaning that in PPS25 terms, South Quay is sequentially less preferable to Marsh Lane. Development on South Quay requires it to be raised by some 1.85m, which would further destroy surviving elements of the historic quay and would have a knock-on effect on the height of development, again affecting OUV.
- 6.34 Connect Consultants has undertaken an assessment of the effects of a foodstore development in central Hayle and a technical note is included at **Appendix L**.
- 6.35 It concludes "*...that central Hayle cannot cope with additional traffic demand after the implementation of the Hayle Harbour scheme* [the scheme subject to the March 2009 Penwith District Council resolution] *without significant mitigation works which cannot be implemented in this location due to lane constraints.*" This scheme is assumed to be a



commitment, even though the S106 has not been signed.

- 6.36 Both Transportation Assessments (TAs) for the Morrison and ING foodstore applications omitted an assessment of impact during the Saturday lunchtime peak, which is considered to be a significant omission as this is typically the busiest trading period for a foodstore. It is also considered that both TAs have adopted unrealistically low trip generation assumptions, with the effect that the ING TA is considered to have underestimated about 200 trips each way (ie 200 arrivals and 200 departures) during the weekday evening peak and the Morrison TA is considered to have underestimated approximately 100 trips each way in the same period.
- 6.37 A more realistic assessment of the likely traffic impacts of a foodstore development on the Harbourside leads Connect to conclude that either foodstore development would impact significantly on the operation of Foundry Square junction (with all the attendant safety implications), which in turn is likely to result in a large number of trips in central Hayle being displaced onto the A30 strategic road network.

Viability

- 6.38 It is understood that South Quay is contaminated, extensive repairs are required to the harbour wall and flood defence works would be required to prepare the site for development. There is also likely to be a requirement for significant transportation linkage improvements as part of any development of the site. These exceptional development costs are likely to impact on the viability of any foodstore development on South Quay.
- 6.39 The withdrawn ING application includes within its Heritage and Viability Statement a viability assessment that concludes at paragraph 4.20 that *"The 40,000 sq ft net foodstore represents the only form of development that can cover the significant enabling costs required and allow for the development of this site to come forward."*
- 6.40 The Council considered this form of development to be unsuitable on South Quay and had the application not been withdrawn, it would have been taken to Committee with a refusal recommendation.
- 6.41 It is understood that ING is currently preparing a planning application for a smaller foodstore as part of a more comprehensive application proposal. Given that ING originally justified the move away from a comprehensive mixed-use approach to the site to a pure foodstore development on the basis of viability, it is difficult to conceive how, in the context of the above quotation, a smaller foodstore combined with a mix of uses that were previously



considered by ING to be unviable together with a greater level of spend on linkages and heritage improvements could be realistically deliverable in any economic climate. By ING's own admission, it is a matter of fact that **only** a 40,000 sq ft foodstore development on its own represents a viable form of development on South Quay. If such a form of development is unacceptable to the Council, it follows that a smaller foodstore, whether or not forming part of a comprehensive development on South Quay, would be unviable.

Summary

- 6.42 Even though South Quay may be available for a foodstore development, it is concluded that it is unsuitable for a foodstore on heritage, flood risk and traffic grounds. It is also concluded that such a development would be unviable, unless it comprised a foodstore with a net sales area of at least 40,000 sq ft, minimal heritage benefits and no other uses (as per the withdrawn application that was considered to be unacceptable in heritage terms).
- 6.43 Although it may be possible to design a smaller convenience store as part of a wider mix of uses in accordance with the Local Plan, such store would be unlikely to meet the identified need for a main food shopping destination and by ING's own admission would not be viable.

Jewson

Description

- 6.44 The Jewson site occupies an edge of centre location to the west of South Quay and comprises an irregularly shaped area of land that according to the Actoris Ltd application forms for a foodstore dated 21.04.10, extends to 1.63ha. The site fronts Carnsew Road and Carnsew Pool. It is occupied by Jewson building supplies and includes an L-shaped building in the south-west corner of the site that is a grade II listed former timber store. It is understood that the site is likely to be contaminated.
- 6.45 The site is allocated in the adopted Local Plan under Policy TV-D for mixed use development as part of a wider comprehensive redevelopment of Hayle Harbourside. The site is within a Conservation Area and a World Heritage Site, and partly within a flood Zone. The site also adjoins an Area of Great Scientific Value.
- 6.46 The site is identified in the now abandoned draft AAP as a Potential Development Site (H1) for mixed use development as part of the Harbourside allocation, including retail development that is located in close proximity to the defined shopping areas at Penpol Terrace and Foundry Square.

Availability

Policy Pre-Conditions

- 6.47 The policy pre-conditions are the same as those for South Quay. The Jewson site is allocated for comprehensive mixed use development under Policy TV-D of the Penwith Local Plan. There are the same significant heritage-related pre-conditions to development of Jewson, relating specifically to repair of the listed harbour walls and the retention of the slipways as well as the retention of the listed building.

Ownership

- 6.48 The site is understood to be owned by Jewson which currently operates a builders' merchant on the land. It is considered to be available for a foodstore development by virtue of the current application by Actoris Ltd for a foodstore, with Morrison understood to be the prospective occupier.

Suitability

- 6.49 At 1.63 ha, the site is considered to be too small to accommodate the scale of foodstore development capable of providing for main food shopping trips and reducing expenditure leakage, which is considered to be closer to 2.0ha. The Actoris Ltd application aptly demonstrates this with its awkward and constrained layout that identifies a foodstore building and service yard backing onto the visually sensitive estuary. CGI P305 submitted in connection with the application clearly shows the harmful impact of the development on views across the estuary.
- 6.50 The site is heavily constrained by the listed building, conservation area and its WHS status. Historically, the site was largely open and the replacement of the unsightly buildings associated with Jewson operation with a single equally large foodstore would not preserve OUV. The Heritage Impact Assessment concludes that the new Morrison foodstore would overwhelm Carnsew Quay as an important part of the historic environment; that it would prevent the exposure and integration of these important historic features; that it would damage the panorama from Plantation, an Iron Age fort; and that there would be an absence of any local distinctiveness, a criticism of the dismissed housing appeal on the adjoining site. Accordingly, the clear conclusion is that the Morrison proposal would seriously damage OUV.
- 6.51 In flood risk terms, 9% of Jewson is in flood Zones 2 or 3 compared to 14% of the Marsh



Lane site, making it sequentially preferable in PPS25 terms.

- 6.52 The assessment undertaken by Connect (at **Appendix L**) concludes that a foodstore of the size being proposed on the Jewson site would result in significant traffic impact in terms of queuing on Foundry Square, as well as safety problems.

Viability

- 6.53 The planning policy context, statutory and physical constraints affecting the site are likely to limit its ability to accommodate a foodstore development that can genuinely cater for the main food shopping needs of Hayle residents. This could raise doubts as to whether a foodstore development on Jewson would be viable, particularly if it were required to make a significant contribution to heritage enhancements or amended to enable the slipways to be preserved.

Summary

- 6.54 The Jewson site is too small to accommodate a store of the size required to meet a clearly identified need. It is not suitable to accommodate a foodstore development in heritage and traffic terms and there must be legitimate uncertainty about its viability. Accordingly, Jewson is discounted as a sequential site.

North Quay

Description

- 6.55 North Quay is an irregularly shaped parcel of land on the north side of Hayle Harbour, extending to about 6.7ha. The site adjoins the Towans area to the north and east and fronts the Harbour to the west. The centre of the site is located approximately 600m from the edge of Foundry town centre and approximately 1.2km from Copperhouse town centre; it is therefore considered to be out of centre.
- 6.56 Local Plan Policy TV-D allocates the site for mixed use development as part of the comprehensive redevelopment of the Harbourside. The site is located within Conservation Area, the WHS, a flood Zone, and adjoins a SSSI. The site is identified in the abandoned draft AAP as a Potential Development Site (Policy H1).



Availability

Policy Pre-Conditions

- 6.57 The policy and statutory pre-conditions are broadly the same as those for South Quay and Jewson.

Ownership

- 6.58 The site is understood to be owned by ING. No discussions have taken place with ING to confirm the site's availability for a foodstore. However, it is considered that ING is unlikely to support a foodstore on North Quay that would be a rival to its South Quay proposals. We would therefore question whether North Quay would be available for a foodstore development.

Suitability

- 6.59 North Quay is irregular in shape and comprises a relatively narrow strip of land between the estuary and the rising hillside behind.
- 6.60 The Heritage Impact Assessment states that North Quay was historically open apart from the now listed stables and small storage "hutches". It concludes that a foodstore anywhere near the water frontage would have a major detrimental impact on views from various locations and even a development set into the hillside would harm views from across the estuary. In heritage terms, North Quay is slightly less sensitive than South Quay or Jewson but a foodstore development still has the potential to harm OUV.
- 6.61 In traffic terms, the main challenge would be to secure a suitable access to North Quay that respects the character and setting of the listed bridge. With reference to Connect's assessment at **Appendix L**, traffic impacts on Foundry Square and the A30 are also likely to be significant.
- 6.62 In terms of the PPS25 sequential assessment of proportionality, North Quay performs less well than Marsh Lane with 22% of it being within flood Zones 2 and 3, compared to 14% for Marsh Lane. It is therefore sequentially less preferable to Marsh Lane in PPS25 terms.
- 6.63 North Quay is therefore considered to be unsuitable for a foodstore in heritage, traffic and flood risk terms.



Viability

- 6.64 In commercial terms, North Quay is relatively isolated and the potential for good access from main roads is limited. This will affect its commercial attractiveness and therefore viability for a foodstore that would need to provide legitimate competition with stores in Camborne or Penzance. Furthermore, significant exceptional costs relating to the need to improve the access and the listed harbour walls and bridge together with contamination remediation would need to be taken into account. If ING decided that North Quay would make a more viable foodstore site than South Quay (the viability of which is at best uncertain), or if the planning case would have been lower risk, then presumably it would have submitted a foodstore planning application on North Quay instead. The fact that it hasn't may be an indicator of concerns relating to commercial viability and/or planning risk.

South Quay and Jewson

Description

- 6.65 The Council has requested that a combination of Jewson and South Quay is considered as a sequential site. This is a hypothetical exercise relating to a possible site without a defined boundary. However, it is accepted that it would be possible to define a site that is potentially large enough to accommodate a foodstore with ancillary car parking and servicing.
- 6.66 This combination of land would be edge of centre, but the potential to achieve good linkages with Foundry would depend on the position and orientation of the foodstore within the site and other elements such as the provision of a footbridge over Penpol Creek.
- 6.67 As noted above, these sites are identified in the abandoned draft AAP (Site H1) as Potential Development Site for mixed use development including retail development that is located in close proximity to the defined shopping areas at Penpol Terrace and Foundry Square.

Availability

Policy Pre-Conditions

- 6.68 The policy pre-conditions are the same as those for South Quay and Jewson. The site is allocated for comprehensive mixed use development under Policy TV-D of the Penwith Local Plan. The same significant heritage-related pre-conditions to development of South Quay



and Jewson apply to a combination of these sites.

Ownership

- 6.69 The site is understood to be owned by ING and Jewson.
- 6.70 The Jewson site has not been incorporated into the ING Harbourside regeneration scheme to date despite sharing the same long standing Local Plan allocation and is now subject to a planning application for a foodstore on land outside ING's ownership. The ING site was subject to a separate and now withdrawn foodstore application and it is understood that ING is currently preparing a revised application for South Quay only. This suggests that neither landowner is prepared to incorporate the others ownership to form a larger site and it would be reasonable to cite this as an indicator that a combination of South Quay and Jewson is not available.

Suitability

- 6.71 Depending on where the site boundary is drawn it is conceivable that this site is marginally less sensitive than South Quay or Jewson individually because it may not necessarily involve development on the sensitive waterfront. However, the Heritage Impact Assessment undertaken for South Quay and Jewson applies equally to the combined Jewson/South Quay site and results in a similarly clear conclusion that this site would not be suitable for a foodstore development.
- 6.72 In terms of flood risk, 35% is in flood Zones 2 or 3 (compared to 14% for Marsh Lane), making it sequentially less preferable to Marsh Lane.
- 6.73 The assessment at **Appendix L** also applies to the combined South Quay/Jewson site and it can therefore be concluded that based on a realistic assessment, the traffic effects of a foodstore on this site would be unacceptable.
- 6.74 It is therefore concluded that this site would not be suitable to accommodate a foodstore on grounds of heritage, flood risk and traffic.



Viability

- 6.75 Not enough information is known about the likely development costs to enable a full consideration of viability. However, the development would need to be heritage-led and mixed use and it would need to include full repairs to the harbour walls and retain the slipways as well as address flood risk, contamination and linkage requirements. Development costs are therefore likely to be significant.

Summary

- 6.76 As noted above, it is considered that a combination of Jewson/South Quay is not available because of the significant doubt that a deal could be achieved between the respective landowners site given the fact that this has not been achieved to date, despite the same long-standing Local Plan allocation that applies to both sites. There must also be significant uncertainty as to the ability to design a heritage-led foodstore scheme capable of addressing successfully the complex layers of policy and other material considerations that guide development in this part of Hayle. This site is sequentially less preferable in PPS25 terms than Marsh Lane. It would also result in unacceptable traffic and safety impacts.
- 6.77 A foodstore development would have to cover the potentially significant costs associated with relocating Jewson, contamination remediation, flood defence, harbourside wall repairs and linkage improvements, including a new bridge across Penpol Creek. However, these costs cannot be objectively assessed in the absence of a detailed scheme and more information relating to development costs.
- 6.78 Jewson/South Quay is therefore discounted on availability and suitability grounds and there can be no guarantee that a heritage-led mixed use development including a modest foodstore would be viable given the viability appraisal submitted in connection with the withdrawn ING application.

R&J Supplies

- 6.79 The Council and GVA accept that R&J Supplies can be discounted as a sequentially preferable site, although the assessment is provided below for completeness.

Description

- 6.80 The site is situated to the east of Copperhouse in an edge of centre location and extends to about 0.7ha. The site is a long and narrow with very limited road frontage and is surrounded by housing.
- 6.81 The site is allocated in the adopted Local Plan for residential development and is within a Conservation Area. The site is identified in the draft Hayle AAP as a Potential Development Site (H4). The draft Hayle AAP envisages a mixed use development on the site to complement the growth of Copperhouse town centre, while the PRS envisages residential development, stating that "*...the layout and location of the site does not lend itself well to retail uses...*" but that "*...small scale retail and commercial uses may be appropriate.*". The PRS states that "*...the site is unsuitable for large scale retail development.*"
- 6.82 The draft Hayle AAP Response to Public Consultation (paragraph 2.4.5) states that nearly 70% of respondents supported carrying forward the existing housing allocation on the site. The remaining 30% suggested allocating the site for an emergency services hub, leisure uses, employment, shopping or a cinema. There was no support for retailing.

Availability

Policy Pre-Conditions

- 6.83 As noted above the site is allocated for housing development in the Local Plan and is within a conservation area. The PRS considers it unsuitable for large scale retail development.

Ownership

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

Suitability

- 6.85 The Conservation Area provides a significant constraint to development. Housing abuts all flanks of the site, which could lead to a conflict of uses, particularly in terms of potential amenity impact.
- 6.86 The site extends to 0.7ha and is therefore too small to accommodate a large foodstore and ancillary car parking, as well as being poorly configured. If a small foodstore could be developed on the site taking into account the physical and other constraints, it would be



likely to function as a top up destination and compete directly with Co-Op and Lidl and would not meet the quantitative and qualitative need.

- 6.87 The site would not offer any opportunity for meaningful retail frontage, making the site unsuitable for commercial retail development.
- 6.88 R&J Supplies is the best performer in terms of the proportion of the site in flood Zones 2 or 3 because all of it is within flood Zone 1.

Viability

- 6.89 The size and configuration of the site and the absence of retail frontage is likely to impact on the trading capability of a foodstore. This factor is likely to significantly diminish the viability of the site for convenience retail use.

Summary

- 6.90 Even if the R&J site is available, it is considered unsuitable for foodstore development, and there would be significant uncertainty as to whether such a development on the site would be viable.

Loggans Moor

- 6.91 The Council accepts in its consultation response to the withdrawn application that Loggans Moor can be discounted as a sequentially preferable site, although the assessment is provided below for completeness.

Description

- 6.92 Loggans Moor is an irregularly shaped greenfield site located circa 800m east of Copperhouse, on the north side of the A30 Loggans Moor roundabout. The site area is about 4.9 ha and it rises steeply to the north-west. Overhead power lines cross the site. The site is in an out of centre location and on this basis, is not sequentially preferable to the application site.
- 6.93 In 1996, an appeal against the Council's refusal of planning permission for service area facilities was allowed, although the permission was never implemented. An appeal against the non-determination of a revised planning application for service area facilities and a retail store was withdrawn in 1996.



The site is not allocated for development in the Local Plan, but is located within a flood risk Zone and abuts an Area of Great Scientific Value (Policy CC-8), which is a designation of countywide importance. These areas act as a buffer around the most important and sensitive nature conservation sites and provide links between protected sites facilitating the movement of wildlife. A SSSI is located to the east (Policy CC-7), which states that it is important that any development outside the designated boundary of the SSSI should not have any adverse impact on the value of the site itself.

- 6.94 The site is also located within the setting of Loggans Mill, which is a listed building.
- 6.95 The abandoned draft AAP identifies Loggans Moor as a Potential Development Site (site H30) and concludes that it is not a preferred location for retail development.
- 6.96 The site abuts the A30 and Loggans Moor roundabout to the south and a limited stretch of the north-west boundary of the site adjoins the B3301 Loggans Road.

Availability

Policy Pre-Conditions

- 6.97 As noted above the site is subject to a series of planning designations that affect its suitability for a foodstore.

Ownership

- 6.98 The applicants have been unable to make contact with the landowners to date. However, it is assumed that the site is available for development.

Suitability

- 6.99 The site is physically large enough to accommodate a foodstore of an appropriate size to meet identified need. However, it would require substantial re-grading to provide a site capable of accommodating foodstore and an adjoining car park and it would need to be demonstrated that these works would not adversely affect the SSSI and the Area of Great Scientific Value. Adverse effects may be caused by a variety of factors including raising or lowering the water table as a result of ground works and development.



- 6.100 The listed Loggans Mill is located approximately 30m to the west. Any development would therefore be located within the setting of the listed building and it would need to be demonstrated that they would not harm the setting of the listed building.
- 6.101 An overhead power line stretches across the site. Any development would require consent from Western Power Distribution to divert the power line and it is uncertain whether such consent would be forthcoming. The Environment Agency may also object to the diversion or proposals to culvert the leat.
- 6.102 The Highways Agency is likely to strongly resist the formation of a new junction to the A30 or an additional roundabout arm because 6 arm junctions tend to have very poor accident records. An access directly off the A30 trunk Road is therefore very unlikely to be granted planning permission. A foodstore accessed from Loggans Road would concentrate traffic on the B3301 and it would need to be demonstrated that Loggans Road and the twin mini roundabouts have the capacity to accommodate traffic generated by a foodstore.
- 6.103 Loggans Moor performs less well than Marsh Lane in PPS25 terms because 25% of it is within flood Zones 2 and 3, compared to 14% of Marsh Lane.

Viability

- 6.104 The three key factors affecting the viability of the site relate to the costs of re-grading the site which will require significant engineering works, the costs of providing suitable access and the costs of diverting the overhead power lines and leat. There is no guarantee that a foodstore would be financially viable.

Summary

- 6.105 It is concluded that there must be significant uncertainty as to whether a foodstore development on the Loggans Moor site could provide suitable access or that the re-grading works necessary to prepare the site for development would be acceptable in terms of environmental impact. These works are likely to involve significant exceptional costs and there must also be uncertainty that a foodstore development on the site would be viable.



Hayle Rugby Club

Description

- 6.106 Hayle Rugby Club is located to the south of West Cornwall Shopping Park adjoining the A30. A mix of employment and other commercial uses lie to the east. The site extends to 4.2 ha and is currently occupied by the club house in the north east corner with the remainder being a flat playing area.
- 6.107 The site is situated in an out of centre location close to the application site and in terms of PPS4, is not considered to be sequentially preferable to the application site.
- 6.108 The site is not allocated for development in the Local Plan. However, the Local Plan (Policy R-3) resists the development of sports pitches unless an alternative and qualitatively improved facility can be secured through an obligation. PPG17 (paragraph 13) reiterates the same requirements.
- 6.109 The site is allocated as a Potential Development Site in the abandoned draft AAP (site H32) and concludes that due to its out-of-centre location, it is not a preferred location for retail development.

Availability

Policy Pre-Conditions

- 6.110 As noted above the site is not subject to any specific Local Plan policies or designations.

Ownership

- 6.111 The site is understood to be owned by Hayle Rugby Club and the site is currently used as a sporting facility. A foodstore development on the Rugby Club site would involve as a pre-condition the relocation of the Rugby Club. It is not for Sainsbury's to undertake an assessment of potential relocation sites – that is the role of the Rugby Club and its advisers. However, it is relevant that there are currently no sites allocated in the Local Plan or the abandoned draft AAP in or around Hayle for sports pitches that could potentially accommodate a relocated rugby ground with an associated club house, changing facilities floodlighting and car parking. Furthermore, there are no current applications or an extant planning consent for a relocated rugby club facility in Hayle. Until such a site is under the



control of the applicant, an implementable consent is in place and funding is available for the relocation, it can be concluded that the Rugby Club is not available for development.

- 6.112 Even if a relocation site can be identified for the Rugby Club, there are a number of significant planning factors which would need to be addressed by any application for a relocated Rugby Club including access, the impact of flood lights, the operation as a whole on amenity and the landscape, and the potential to demonstrate that the site can offer qualitative improvements over the previous facility.
- 6.113 It is understood that a site is being discussed with the Council but as yet no planning application has been forthcoming and it is not possible to come to a view on its planning merits. In any event, to do so could pre-judge the formal determination process.
- 6.114 The PRS states at page 68 that the timescale for developing the Rugby Club site is medium to long term. The PRS assessment also notes that the existing use provides *"...an important facility for Hayle and relocation would be required, and considered acceptable, if redevelopment of this site can occur."*
- 6.115 It is therefore concluded that the rugby club site is not currently available and at the very least there must be uncertainty as to whether it will become available within a reasonable period of time.

Suitability

- 6.116 The site is not allocated for development in the Local Plan, although it is identified as a Potential Development Site in the abandoned draft AAP (site H32).
- 6.117 Planning policy at a local and national level resists the loss of sports facilities unless they can be successfully relocated to an alternative site which offers qualitative improvements. Since there is no certainty that local and national policy can be met in this regard, we consider a foodstore development on this site to be unsuitable by virtue of the loss of sports facilities based on a pre-cautionary approach.
- 6.118 It is accepted that this site is not subject to any designations in the Local Plan that would affect consideration of development applications but it remains the case that currently the site is not available or suitable for development until the Rugby Club has been relocated.



- 6.119 In terms of the PPS25 sequential test, Hayle Rugby Club site performs better than Marsh Lane, with 9% being within flood Zones 2 and 3.

Viability

- 6.120 The viability of developing a foodstore on the site is dependant upon the costs related to the relocation of the rugby club and construction costs associated with the foodstore and associated development. Insufficient information is available to form a judgement about viability.

Summary

- 6.121 Until the Rugby Club relocates, the site is neither available nor suitable for a foodstore development and it is therefore discounted on this basis. The flood zone consideration is undertaken in the PPS25 sequential test assessment, although it is considered that there is little to choose between the application site and the Rugby Club in flood risk terms and the assessment of the application site below in the context of the significant ecology mitigation benefits being provided by the applicant enables the concludes to be made that the County Wildlife Site designation presents an opportunity for the Sainsbury's development to deliver public access to an improved and hitherto private and unmanaged County Wildlife Site.

Land at Marsh Lane (The Application Site)

Description

- 6.122 The application site is an undeveloped parcel of land that is situated in an out of centre location immediately to the east of the West Cornwall Shopping Park and north of Hayle Industrial Park. A mixture of large scale retail and commercial buildings are therefore located in close proximity to the site.
- 6.123 The part of the site where the foodstore would be developed extends to about 2.3 ha and is predominantly flat. It is accessed off the A30 at Loggans Moor roundabout via Marsh Lane.
- 6.124 The site is not allocated for development in the Local Plan and forms part of a locally-designated County Wildlife Site and a very small part of it is within flood Zones 2 and 3.
- 6.125 The site is identified in the abandoned draft AAP as a Potential Development Site (H31). Although the draft AAP suggested that it was not a preferred location for retail development because of its out of centre location, it acknowledged that should a need be identified for



further out of centre floorspace in Hayle and having satisfied the sequential approach, that there may be benefits in locating additional retail space adjacent to the West Cornwall Shopping Park (paragraph 7.3.29). It is telling that this comment was not made in connection with any other potential sites in the vicinity and was based on the findings of the PRS.

Availability

- 6.126 The site is available exclusively to Sainsbury's under the terms of a contract with Cranford (Hayle) LLP, who are joint applicants.

Suitability

- 6.127 As noted above, the site is not allocated for development in the adopted Local Plan. However, the acknowledgement that there may be advantages in locating retail development adjacent to the West Cornwall Shopping Park provided the then PPS6 tests can be addressed successfully is clearly significant even though the draft AAP has now been abandoned and it is noteworthy that this comment is not made in connection with the Hayle Rugby Club site.
- 6.128 The Planning Statement submitted in connection with the planning application addresses the site's location in relation to Hayle and the principle of development and explains that the site is in an area characterised by large scale retail and commercial development that has in recent years spread over the A30, as a result of planning consents granted by the Council. It refers to the support demonstrated by the Secretary of State and the Council to convenience and comparison shopping proposals on the out of centre West Cornwall Shopping Park and also in respect of the Lidl, Carwin Rise which is also in an out of centre location. It concludes that the site is well related to the existing pattern of development and it is the only site in the immediate area that the abandoned draft AAP specifically recognised as having the potential to accommodate retail development.
- 6.129 14% of Marsh Lane is situated within flood Zones 2 and 3. It therefore outperforms South Quay, North Quay, South Quay/Jewsons combined and Loggans Moor in terms of the PPS25 sequential test. The proposed foodstore can largely be accommodated on land outside the flood plain and the PPS25 sequential test assessment concludes that there is little to choose between the Rugby Club and the application site in terms of the proportion of each site in lower/higher flood plains. A comprehensive package of flood mitigation has been prepared



that includes additional flood storage capacity on land to the north of the foodstore, that also forms part of the application site. Further information can be found in the Flood Risk Assessment and the PPS25 Sequential Site Assessment which conclude that the application proposals meet the PPS25 policy tests. Pre-application discussions with the Environment Agency indicate that there is no objection to the proposals in hydrology terms.

- 6.130 The foodstore is located on the least sensitive part of the County Wildlife Site in bio-diversity terms and it is considered that the development would not result in significant adverse effects to it. A comprehensive mitigation strategy is submitted with the planning application that protects and enhances existing habitats and species as well as providing significant additional bio-diversity benefits, including some 2.30 ha (5.68 acres) of additional land that would result in a net increase in the size of the County Wildlife Site. About 10.85 ha (25.85 acres) of the County Wildlife Site in the applicants control will be offered to be dedicated to the Council and for the first time public access could be provided to the site for the local community and wildlife enthusiasts. Further information can be found in the Ecological Mitigation Strategy documents that are submitted in connection with the application.
- 6.131 The Transportation Assessment concludes that appropriate access can be provided, including improvements to the A30 Loggans Moor roundabout and Marsh Lane. The public transport improvements being promoted by Sainsbury's referred to earlier in this assessment would ensure that the site can be well served by non-car modes of transport, enabling Hayle residents who do not have access to a car to visit the Shopping Park and Sainsbury's in a single trip. It can therefore be concluded therefore that a foodstore development on this site would contribute to social inclusion objectives.
- 6.132 This assessment has demonstrated that there is an urgent requirement for a genuine main food shopping destination to serve Hayle residents who currently have no choice but to travel to Penzance and Camborne. It concludes that the proposals would satisfy other PPS4 criteria and the provisions of the development plan relating to retail development including need, scale and impact.
- 6.133 The WYG household survey indicates that locating the proposed foodstore close to the West Cornwall Shopping Park would have significant benefits in terms of linked trips. It would also provide a dual use car park, enabling visitors to Sainsbury's to visit the Shopping Park and vice versa.



Viability

- 6.134 The application site is capable of viable foodstore development proposal and if planning consent is granted, the foodstore will be brought forward as quickly as possible.

Summary

- 6.135 The Marsh Lane site is the only out of centre site identified in the abandoned draft AAP as a Potential Development Site that was acknowledged as having the potential for retail development as a result of its location adjacent to the West Cornwall Shopping Park. This assessment concludes that the proposed foodstore would have acceptable and in many cases positive impacts when considered against PPS4 tests. This application is accompanied by technical assessments relating to transportation, hydrology and ecology, all of which conclude that a foodstore development on the site would be acceptable and would have a series of material benefits.

Conclusions on the Sequential Approach

- 6.136 Significant doubt exists about the suitability of any of the Harbourside sites for a foodstore development, given the raft of restrictive planning policies and statutory controls affecting development on them. Potentially significant traffic congestion that is likely to arise from foodstore development on any of the Harbourside sites provides a further significant challenge to their collective suitability.
- 6.137 Additional constraints have been identified for the Harbourside sites. For example, North and South Quay and Jewson/South Quay combined sites are less sequentially preferable to the application site in flood risk terms. South and North Quay sites have questionable viability (the former by ING's own admission) and also have major challenges in terms of vehicle access and movements.
- 6.138 The Council has accepted that R&J Supplies and Loggans Moor can be discounted as sequential sites.
- 6.139 Hayle Rugby Club is not currently available for foodstore (or any other) development and will not be available until such time as the Rugby Club has relocated. At the time of writing, the Rugby Club still occupies the site and as a matter of fact this makes the site unavailable and unsuitable for a foodstore development. It would be inappropriate to undertake this



assessment on the basis of a different assumption as this would pre-determine the outcome of any planning application for the Rugby Club relocation.

- 6.140 The Sainsbury's site at Marsh Lane represents the best opportunity to provide Hayle residents with a modern, socially inclusive genuine main food shopping destination. The site is available now exclusively to Sainsbury's; it is suitable and capable of viable foodstore development.
- 6.141 In terms of retail policy, the Sainsbury's site on Marsh Lane is considered to be the best available site to deliver the much needed step change in Hayle's retail offer recommended by the PRS, together with a range of additional community benefit.
- 6.142 Accordingly, this assessment concludes that there are no other sequentially preferable sites that are available or suitable to meet the identified need and it follows that the Sainsbury's site at Marsh Lane satisfies the sequential approach to site selection.

7.0 THE IMPACT ASSESSMENT

Policy Context

7.01 This section of the assessment sets out the impact analysis required by Policy EC17.1 (b) and EC17.2 of PPS4. This includes reference to Policy EC10 and Policy EC16. A comprehensive assessment of the likely impact of the proposed development is therefore set out. The methodology adopted accords with PPS4 guidance and is consistent with CLG Practice Guidance on Need, Impact and Sequential Approach.

Economic Development Impacts

7.02 In line with the Government's overarching objectives, PPS4 aims to achieve sustainable economic growth through improving the economic performance of cities, towns, regions and local areas. This is to be combined with reducing the gap in economic growth rates between regions, promoting regeneration and tackling deprivation, delivering more sustainable patterns of development and promoting the vitality and viability of town and other centres.

7.03 Policy EC10.2 of PPS4 states that local planning authorities should adopt a positive and constructive approach towards economic development proposals. In assessing such applications, impacts including carbon dioxide emissions; accessibility by a choice of means of travel; quality of design; regeneration and employment should be considered.

7.04 Each of the impact considerations are considered in turn below.

Carbon Dioxide Emissions and Resilience to Climate Change

7.05 The Sustainability Statement submitted in connection with the application sets out the Sainsbury's approach to sustainability at a national level, as well as how it will integrate sustainable measures in the proposed development. It explains that energy efficiency is one of the key influencing factors in the design of the proposed Sainsbury's store.

7.06 Sainsbury's are committed to reducing the environmental impact of the proposed development scheme in both its design and construction. This commitment ensures a number of design initiatives, sustainable sourcing of materials, re-use of redundant materials from the existing site, efficient use of energy and resources, and site waste reduction programmes.



- 7.07 The store will achieve a minimum level of performance equivalent to BREAM Rating “Very Good” and will include the following initiatives:
- Natural daylight sunpipes ‘light tubes’
 - Embodied carbon measurement and management
 - Rainwater harvesting to flush wc’s
 - Cantilevered canopy acting as a brise soleil
 - Glazing to maximise use of daylight
 - Sustainable Urban Drainage system to be installed
 - All food waste to anaerobic digestion rendering or composting.
- 7.08 Energy saving technologies will be installed for lighting, heating/cooling and refrigeration systems designed to minimise energy use. These include presence detector systems for lighting in staff areas and the service yard, sun pipes, the use of cool air from the refrigeration aisles to cool areas of the store such as computer rooms and hot air from the refrigeration packs to heat the store. A full building management system that pre-authorises all power usage will be used alongside an energy ICT metering system for performance management, ensuring effective ongoing operation and energy efficiency.
- 7.09 Sainsbury’s seek to reduce, reuse and recycle food waste through a variety of methods including the distribution of food boxes to charities and the use of anaerobic digestion waster facilities. As a result, Sainsbury’s will not send any food waste from the proposed store to landfill sites. This is coupled with a wider corporate commitment to the target of a 50% reduction in all waste to landfill against the 2005/06 baseline by 2012. Recycling is promoted through the development and sale of recycled goods. On-site recycling bank facilities will be provided as part of the scheme that will allow the safe and responsible disposal of metals, glass, fabric and paper for use of customers and the wider public.
- 7.10 In terms of climate change, the hydrology modelling contained in the in the Flood Risk Assessment that is submitted in connection with this application includes appropriate assumptions relating to climate change in terms of rainfall and rising sea levels. These assumptions have been agreed with the Environment Agency.



- 7.11 It is also reasonable to consider that the Sainsbury's store would claw back trade which currently leaks from Hayle to other retail destinations, particularly large out-of-centre stores in Penzance and Camborne. The resulting reduction in the need for residents to travel to competing main food retail facilities outside the town will reduce carbon emissions. These savings will also benefit the environment and wider road network through reducing the length of journeys undertaken for main food shopping.
- 7.12 As noted in the Transport Assessment, the proposed foodstore is likely to attract a high level of linked trips with existing visitors to the West Cornwall Shopping Park. It is estimated that 30% of the weekly trips attracted to the store are likely to be linked with those to the shopping park. It is reasonable to consider that this level of linkage is likely to further reduce the total number of car trips for main and top-up food shopping purposes. Again, this is likely to reduce carbon dioxide emissions.
- 7.13 Overall, the proposed development is likely to have a positive impact in terms of reducing carbon dioxide emissions and makes appropriate allowances for climate change.

Accessibility

- 7.14 The Transport Assessment submitted in connection with this application addresses the accessibility of the proposal by a choice of means of transport. The document clearly sets out the site access arrangements and proposed on and off-site highways improvements included in the submission. Whilst it is not the intention to repeat the analysis set out in the Transport Assessment which should be read in conjunction with the Retail Assessment, it is found that the application proposal will significantly improve the accessibility of the application site by a range of modes of transport, as well as increase the synergy with the neighbouring retail park.
- 7.15 In summary the significant package of highways and accessibility improvements included as part of the application proposal are as follows:
- Signalisation and improvements to Loggans Moor Roundabout, along with improved pedestrian and cycle crossing facilities;
 - Widening of Marsh Lane between Loggans Moor Roundabout and the West Cornwall Shopping Park access, as well as improvements including the provision of 2 new bus stops and a bus turning facility, signalised pedestrian crossing point, footway



improvements, roundabout facilitating a pedestrian access to the store and priority junction for service vehicles.

- A footpath link between Angarrack and the foodstore that will also act as a traffic calming measures along Marsh Lane, slowing traffic as it enters Angarrack
- Improvements to public transport connections including a new bus link to central Hayle and surrounding residential areas to be funded by Sainsbury's.

7.16 The application site is situated within 800m of a sizeable residential catchment in the north eastern area of Hayle (an area subject to multiple deprivation), whilst an even greater proportion of the resident population of Hayle and neighbouring Angarrack is within 2km of the store. The whole of Hayle, Angarrack and Connor Downs is within the 5km potential cycle catchment of the application site. Walking and cycling are therefore potentially attractive alternative methods of travelling to the application site for many customers and store colleagues living in and around Hayle.

7.17 The proposals will build on the already reasonably well developed pedestrian network surrounding the site, which provide connections to the West Cornwall Shopping Park. The connections also offer reasonable links to the north eastern and central areas of Hayle via the existing A30 footbridge and these will be improved further by the new at grade pedestrian and cycle crossing facilities of the A30.

7.18 The signalisation of Loggans Moor roundabout will provide highway capacity and potential road safety benefits. Following pre-application discussions with the Highways Authority that identified that the existing footbridge over the A30 is not DDA compliant and does not meet current design standards, the proposals include the provision of street level pedestrian crossing facilities across the A30. The provision of signalised pedestrian crossing facilities at the Loggans Moor roundabout and on Marsh Lane will ensure improved pedestrian accessibility of the site from north east Hayle. Improved pedestrian facilities will also be provided at the West Cornwall Shopping Park.

7.19 When combined with existing connections, this package of improvements will serve to benefit pedestrian accessibility of the application site. They will also improve accessibility of neighbouring destinations such as the West Cornwall Shopping Park, Hayle Rugby Football Club and Hayle Industrial Park. In turn, the improvements will increase linkages between the neighbouring uses.

7.20 It is intended that public transport connections and accessibility to the site are improved as



part of the application proposal. The detailed nature of likely improvements is to be discussed with the Highways Agency and Cornwall Council. As noted above, the improvements include 2 new lay-bys on Marsh Lane at the west and south site boundaries respectively, both offering direct pedestrian links to the store entrance. Subject to discussion with the Highways Agency and Cornwall Council, the improvements are also expected to include the extension of an existing bus service to provide a regular link between the proposed Sainsbury's store, Hayle Town Centre and the surrounding residential areas.

- 7.21 It is also important to note that the proposed development will be subject to a travel plan. The plan will aim to build on the physical improvements and increased accessibility of the site and encourage employees to make sustainable trips to the store.
- 7.22 In its consultation response, GVA refers at paragraph 4.30 to the potential for the development to support linked walking trips with nearby centres. We consider that it would be more appropriate to consider linkage in terms of bus, cycling and walking (as we have done), rather than artificially limiting the test to walking (as GVA has done).
- 7.23 In summary, the proposed development is assessed to be accessible by a range of modes of transport, will have not adverse impact on the surrounding road network and will not lead to any significant increase in the risk of accident. It is therefore considered to be acceptable in terms of accessibility.

High Quality and Inclusive Design

- 7.24 The Design & Access and Sustainability Statement submitted in connection with this application sets out the design concept behind the proposed scheme.
- 7.25 The proposed Sainsbury's store is located to provide an appropriate level of visibility from the A30 and to optimise the potential for pedestrian linkages with the West Cornwall Shopping Park and Hayle. This part of the site is considered to be the least sensitive in terms of hydrology and ecology.
- 7.26 The foodstore is specifically designed to sit low down within the landscape and to provide a bespoke and high quality design. The main store building would be 4.8m in height, ensuring it is well below the level of existing structures commercial and retail development to the south and west of the site. The foodstore will be of a human scale and incorporates large glazed areas on the west (front) elevation to create interest and activity and to reinforce the links to the car park and surrounding area. The design incorporates cladding for energy and construction process efficiencies.



- 7.27 It is also proposed to incorporate a network of pedestrian links to ensure that shoppers can walk safely and directly to the foodstore from Angarrack as well as the new bus stops, the Industrial Park to the south, West Cornwall Shopping Park to the west and both the footbridge and at grade pedestrian crossing over the A30. All pathways from the surface level car park to the store's covered entrance lobby are flat. The entire store is fully accessible to wheelchair users. The checkouts will have extra wide aisles and the toilet facilities will have accessible cubicles.
- 7.28 The design has been improved relative to the withdrawn application scheme. A strip of high level glazing has been added to the Marsh Lane (south) store elevation. Situated above the sales floor, the additional glazing serves two functions: it provides a visual link between the road and the sales floor; and serves as an effective means of articulating the elevation. Additional glazing is added to the north elevation through a series of small windows to the staff domestic areas, providing further increases in natural light and articulation to the elevation. The primary elevation of the store will utilise a glazed curtain wall system with aluminium mullions.

Economic and Physical Regeneration

- 7.29 The PRS recognises that Hayle suffers from serious economic and social deprivation and is a priority for strategic spatial investment. The proposed foodstore is situated close to one of the most deprived areas in England, which is situated on the east side of Hayle.
- 7.30 In this context, Sainsbury's is proposing a significant retail investment in Hayle. Retail development is included in the expanded definition of economic development set out in PPS4. The benefits of employment in the sector are increasingly recognised, particularly in terms of the flexibility and wide ranging appeal of the opportunities created and the level of training provided. The provision of such jobs through the proposed development is a key driver for sustainable growth and will contribute significantly towards the economic regeneration of Hayle.
- 7.31 It is considered that the foodstore development could complement the Hayle Harbourside regeneration that now benefits from planning permission. These respective schemes are not mutually inclusive and could legitimately operate in tandem with one another. Convenience representation on the Harbourside under the terms of this permission is considered likely to be in the form of small niche or specialist retailers rather than the modest sized convenience retailers suggested by GVA (paragraph 4.17 of its consultation response), which would face direct competition from Co-Op Copper Terrace. If the Council agrees with our conclusion



that the Harbourside is not suitable for a foodstore development, it follows that the claim made by GVA about the potential impact of the proposed Sainsbury's on a foodstore development on the Harbourside (paragraph 4.18 of its consultation response) has no basis.

- 7.32 The Sainsbury's foodstore would increase Hayle's self-containment and could help attract new visitors to Hayle. The new foodstore will also support local produce suppliers and provide temporary construction jobs.
- 7.33 An enduring theme of this assessment is that households without access to a car have little choice but to use local foodstores for their weekly shopping needs, even though these stores cater largely for top-up shopping trips. This is socially exclusive. The proposed Sainsbury's will be a socially inclusive form of development for the following reasons:
- It will remedy an existing deficiency in main food shopping provision in Hayle
 - It will provide a high quality grocery offer in a modern, attractive and secure environment
 - Competition with similar foodstores elsewhere will result in consistently low prices for customers
 - The foodstore will be accessible by a choice of means of transport, meaning that those residents without access to a car can visit the foodstore
 - The foodstore will provide a significant number of temporary and permanent new jobs that will be available to the entire community, together with flexible working arrangements and training opportunities for store colleagues (see "Impact on Employment" sub-section below).

Impact on Local Employment

- 7.34 It is a common misconception that jobs in the food retail sector are of lower value than those in other sectors such as manufacturing. However, this perception is changing and the value of retail jobs is increasingly recognised within the wider diversification of the economy. This is reflected in the fact that PPS4 recognises the benefits of retail jobs as economic development alongside other more traditional employment sectors.
- 7.35 In response to the GVA audit of the previously withdrawn application, there is no evidence to support the assumption that the proposal will result in job losses in Hayle as a result of retail impact. There is therefore no evidential basis on which to assume a negative impact



on local employment as a result of the proposed development, as GVA has done.

- 7.36 The proposed development will result in a significant net increase in job opportunities locally. It is anticipated that up to 270 new jobs will be created at the Sainsbury's store; approximately 60 full time and 210 part time roles. Experience suggests that the vast majority of the roles are filled by local people, with 92% of Sainsbury's staff across the country living within 1.5 miles of the store they work. The store will therefore lead to a significant positive impact on local employment.
- 7.37 In addition and if granted permission, would also create a number of temporary jobs during the construction phase of the development. It is anticipated that the proposals would generate approximately 150 construction jobs during the build process, which would fluctuate up and down during the programme.
- 7.38 The mix of roles and working contracts fulfilled at the store will ensure flexible staff working arrangements. These arrangements are easily capable of being tailored to individual need. When combined with the job security and excellent training and personal development opportunities provided by Sainsbury's, this flexibility will increase the attraction of the employment opportunities created, widening the appeal for a cross section of local people. Experience indicates that the jobs created will be suited to these with family responsibility, such as single parents, those on incapacity benefit, students and mature non-claimants.

Jobs and Employment Structure

- 7.39 Jobs vary from shop floor sales (checkout operators, replenishment assistants, nightshift workers and counter staff), support services (delivery and security), administrative, skilled positions in specialist departments such as a bakery, and a range of supervisor, team leader and managerial posts. A typical store employment structure includes: the store manager; duty manager; departmental managers; assistant managers; and other staff. Skilled positions such as the in-store bakery team are included in the supervisory staff level.
- 7.40 The management team in charge of the day to day operation of the store would be likely to include 10 employees. A further 20 positions are classed as supervisory and senior staff. Skilled positions such as the in-store bakery team are included in the supervisory staff level. Remaining staff consists of a variety of experienced and less experienced in-store employees, security and maintenance employees.
- 7.41 Sainsbury's is committed to providing competitive pay and benefits to its colleagues. Salaries are competitive and benchmarked across the industry. All management salaries are set on



an individual basis, taking account of experience and performance. In addition, colleagues receive a further increase in salary after 26 weeks, when they reach the fully competent level of performance. All staff have the option to join a contributory pension scheme, the J Sainsbury Stakeholder Pensions Plan. The majority of shop floor staff and managers are also entitled to a bonus each year and a 10% discount card (usually 15% at Christmas and Easter).

- 7.42 In 2008/09, 120,000 colleagues shared a bonus of £60 million, bringing the total amount paid out in bonuses over the last four years to over £210 million. The bonus scheme is linked to the delivery of great service and product availability as well as overall sales and profit measures. Colleagues also have access to a wide range of voluntary benefits through the "You Choose" programme and a colleague discount of 10% in stores is offered to all eligible colleagues.

Recruitment

- 7.43 Sainsbury's are committed to working closely with the communities in which they are located, to recruiting locally and offering significant training and personal development opportunities to all staff. This is consistent with the commitment to recruit and retain the best staff possible from across local labour markets.
- 7.44 In March 2007, the Government launched the Local Employment Partnerships initiative. The initiative supports benefits claimants, particularly the long term unemployed, helping them get back into work. Sainsbury's has signed up to the Partnership. By working in close collaboration with Job Centre Plus, Sainsbury's has placed over 560 colleagues through across the UK through this programme in 2008/9. Sainsbury's also work closely with organisations such as Mencap, Remploy and National Employer Accords to achieve the goal of widening access to employment to those who may experience difficulties in entering or returning to work.
- 7.45 In partnership with Groundwork, Sainsbury's has established an ex-offenders programme that will help candidates become job-ready with life and work skills as well as providing supported work placement opportunities. In 2007 Sainsbury's became one of the founder partners of MENCAP's WorkRight scheme, supporting individuals with learning difficulties into work. By working with MENCAP Sainsbury's now has access to a previously untapped pool of talent. Separately, Sainsbury's operates the 'Two Tick' scheme where interviews are guaranteed to applicants with disabilities where they meet the minimum requirements for a



job.

Training/Personal Development

- 7.46 Sainsbury's are committed to attracting the best people into their business and retaining them over the long term. This is reflected in their significant investment in training and career development opportunities for all staff. The commitment was recognised in 2007 when Sainsbury's achieved Investors in People re-accreditation.
- 7.47 After signing the Government's Skills Pledge 2007, Sainsbury's became the first retailer to offer its entire workforce the chance to gain nationally recognised qualifications. Sainsbury's offers its 'Skills for Life' initiative that provides courses for Level 1 basic literacy training and/or a Level 1 numeracy and literacy qualification (equivalent level to GCSE). Sainsbury's is also the first retailer to offer every colleague the opportunity to achieve an NVQ Level 2 qualification, which is the equivalent to 5 GCSEs at A-C grade. The Level 2 NVQ recognises colleagues' skills and capabilities as all 'on the job training' will be credited towards the qualification. This means that the essential training required to work in areas such as stock control, visual merchandising, health and safety and administration will now count towards the NVQ Level 2 qualification.
- 7.48 Since signing the Skills Pledge, Sainsbury's has begun mapping their current retail training offer to the national occupational standards. This enables them to offer further craft apprenticeships and Level 2 qualifications across different departments in store. They are committed to providing high-quality training to colleagues whilst also preserving skills that might otherwise be lost from the community. It has been found that embedding apprenticeships and NVQs within day-to-day business operations is the most effective way to achieve wide spread skills development.
- 7.49 Such opportunities will be co-ordinated in-store as a means of helping staff achieve progression to supervisory roles or on to the management level. The co-ordination is based on 3 levels: 'foundation'; 'intermediate' and 'advanced'. All opportunities are advertised internally to staff.
- 7.50 Sainsbury's has set a target for a quarter of its staff to get one of the new qualifications, endorsed by the awarding body EDI, in the next 5 years. Sainsbury's hopes to help 80% of its staff gain national standard qualifications by 2013. Bakery, Meat and Fish Apprenticeships were launched in 2006 and run alongside the above initiatives. The apprenticeships are designed to give colleagues the skills to become fully qualified in 12-



18months. Sainsbury's remains the only retailer to offer three craft apprenticeships.

Awards

7.51 In recognition of the above initiatives, Sainsbury's have been awarded the following accolades over the past 24 months:

- Diamond award for recruiting disabled people (mencap work right scheme)
- The times top 50 places where women want to work
- Employer' forum on age award for innovation
- Investors in people – re-accreditation
- National training award
- Opportunity now female ftse 100 award.

7.52 In summary, the proposed development will create up to 270 new job opportunities in Hayle, which are likely to be attractive to a wide range of people locally. Sainsbury's prides itself on being a quality employer that offers dedicated local recruitment, competitive pay and a high quality working environment. This is coupled with specialist dedicated training and career development opportunities for all staff. These benefits will be offered to staff at the Hayle store. On this basis, it is considered that the proposed development will have a significant positive benefit on local employment.

Town Centre Impacts

7.53 Policy EC16.1 of PPS4 for out-of-centre retail development proposals that are not in accordance with an up to date development plan. Policy EC16.1 states that such retail proposals should be assessed against the following impacts on town centres:

- a) impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.
- b) The impact of the proposal on town centre vitality and viability, including local consumer choice and the range and quality of the comparison and convenience retail offer.
- c) The impact of the proposal on allocated sites outside town centres being developed in accordance with the development plan.
- d) The impact of the proposal on in-centre trade/turnover and on trade in the wider area, taking account of current and future consumer expenditure capacity in the catchment area over a period of up to 5 years.



- e) If located in or on the edge of a town centre, whether the proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres.
- f) Any locally important impacts on centres under Policy EC3.1e, as identified by the local planning authority.

7.54 The impact test set out in point d) above is considered first as the findings of the assessment of likely impact on in-centre trade/turnover assists in considering the other impact tests.

In-centre Trade/Turnover

7.55 Policy EC16.1 d) states that the impact assessment for planning applications for main town centre uses that are not in a centre and not in accordance with an up to date development plan should be assessed against:

"in the context of a retail or leisure proposal, the impact of the proposal on in-centre trade/turnover and on trade in the wider area, taking account of current and future consumer expenditure capacity in the catchment area up to five years from the time the application is made, and, where applicable, on the rural economy"

7.56 In line with this policy criterion, the section considers the impact on in-centre trade/turnover as a whole. This section firstly sets out the likely turnover of the proposed Sainsbury's store, based on a benchmark company average sales density. Expenditure growth available to retail facilities in the catchment area is then considered. Finally a detailed trading assessment of the potential impact that the proposal is likely to have on the patterns of retail expenditure in the surrounding area is set out.

Turnover of Proposal

7.57 Table 1 at **Appendix F** and Figure 5.1 below sets out the total turnover of the proposed foodstore, including the convenience and comparison elements.

Figure 7.1: Proposed Store Turnover, 2010

	Floorspace (sq m)	Sales Density (£/sq m)	Turnover (£m)
Convenience	2,129	9,932	21.1
Comparison	913	7,561	6.9
Total	3,042		28.0

Source: Table 1, Appendix F (2008 Prices)

- 7.58 The proposed floorspace figures are derived from the planning application drawings. The company average sales density derived from Verdict Grocery Retailers (2010). On this basis, the annual turnover of the proposed foodstore is estimated to be £28.0m in total: £21.1m convenience and £6.9m comparison.

Expenditure Growth

- 7.59 Table 2 sets out the population projections for the study area to 2015. The population of the study area as a whole (Zones 1 – 8) of the household survey is assessed to be 169,911. This is forecast to increase by 2.8% to 174,740 by 2013, and by 4.6% to 177,801 by 2015.
- 7.60 It is noted that the catchment area for the proposed development includes Zones 2 and 3 of the household survey area described in section 3. The total population for Zones 2 and 3 of the study area is currently assessed to be 27,015. This is forecast to increase by 2.7% to 27,757 in 2013 and by 4.4% to 28,194 in 2015.

Growth in Resident Convenience and Comparison Goods Expenditure Potential in the Study Area 2010 – 2015.

- 7.61 Tables 3A and 3B project growth in per capita consumer retail expenditure on convenience and comparison goods in the study area to 2015. Expenditure per capita at 2010 and the projections forward to subsequent years are derived from the Experian MMG3 geographic information system (2008 prices).
- 7.62 Using the population and expenditure per capita projections, Table 4A indicates the total available resident convenience expenditure in the study area is £315.8m. This is forecast to grow by 5.1% to £331.9m in 2013 and by 8.6% to £343.1m in 2015. The corresponding figure for the catchment area is £50.1m, increasing by 5% to £52.6m in 2013 and by 8.4%



to £54.3m in 2015.

- 7.63 Table 4B indicates that the total available resident comparison expenditure in the study area as a whole is £460.0m. This is forecast to rise by 9% to £501.2m in 2013 and by 16.5% to £535.8m in 2015. The corresponding figure for the catchment area is £71.6m, rising by 9.2% to £78.2m in 2013 and by 16.5% to £83.4m in 2014.

Tourist Expenditure

- 7.64 Revenue from the tourism sector is a very significant element of the Cornish economy, especially in Hayle and St Ives. Expenditure from visiting tourists who stay in Cornwall supports approximately 40,000 jobs across the region, equating to 17% of all employment (Visit Cornwall: Tourism in Cornwall 1992 – 2007 Staying Visitor Number & Spend (Updated April 2009)).
- 7.65 Within the PCA, St Ives and Hayle are popular with visiting tourists and the area benefits from a range of visitor accommodation. The PCA attracts significant expenditure from a large number of tourists on an annual and seasonal basis, over and above that generated by the resident population.
- 7.66 The importance of tourism to the local economy is illustrated by the range of holiday accommodation and facilities in St Ives and Hayle. Looking at the self catering sector in particular, there is a high incidence of accommodation in the PCA, comprising holiday parks, cottages and camp sites catering for visitors to St Ives and the Hayle area. The accommodation includes:
- camp sites offering a total of 1,811 pitches
 - holiday parks with 737 static caravans, permanent chalets, lodges, apartments and touring van pitches
 - a range of holiday cottages catering for 2,163 visitors.
- 7.67 While it is recognised that proportional spend will vary between tourist sectors such as those travelling on a self-catering basis or using hotels, all visitors are likely to purchase convenience products from foodstores and other facilities in the area. By virtue of its accessible location adjacent to the main road network, the application site is likely to attract a high level of the trade available from tourists. These are likely to include visitors to the area, to south west Cornwall using the main road network and linked trips from those visiting the popular West Cornwall Shopping Park.



- 7.68 By their very nature, household surveys fail to identify the positive impacts of tourist spend on turnover of retail businesses. The assessment therefore allows for an element of additional expenditure by tourists visiting the catchment area. A number of data sources have been considered to inform this analysis. Potential sources include Sainsbury's own commercial assessment of the expected trading performance of a store in this location. An analysis of the number of second homes in the PCA provides an alternative. The PRS includes assumptions on the level of tourist spend based on the usually resident population identified in the household survey combined with a manual adjustment of the results to account for tourism. However, this method is not supported by clear evidence, a limitation recognised in the document.
- 7.69 Having considered each of the above in turn, it was decided to utilise an independent source of data on tourist expenditure in Cornwall. Figures published by Visit Cornwall in their report "The Value of Tourism 2007 Cornwall", and the "Tourism in Cornwall 1992 to 2007 Staying Visitor Numbers and Spend (Updated April 2009)," have informed this analysis.
- 7.70 The method takes the total tourist spend on 'shopping' for Penwith District administrative area to £42.6m in 2007. This is then divided into convenience and comparison expenditure on a 50/50 basis; £21.3m for convenience and £21.3m for comparison. Both the figures are then divided by 3 to reflect the geographic extent of the PCA as a proportion of the Penwith District. This data source and methodology for considering tourism expenditure was accepted in granting planning permission for a Sainsbury's store in Helston, in November 2008.
- 7.71 Importantly, the figures relate only to tourists visiting the area from beyond the study area, and do not include second home owners. It is reasonable to assume that additional expenditure generated by second-home owners, on top of that generated by the usually resident population and tourists would be available to retail outlets in the PCA and study area. Indeed, the principle of including the input of tourist expenditure and its influence on the trading characteristics of retail facilities in the PCA are established in the PRS. The analysis is therefore a robust estimate of tourist expenditure.
- 7.72 Table 4A shows that an additional £7.8m of expenditure on convenience goods is likely to be generated by tourists in the catchment area in 2010 (£3.9m in Hayle and £3.9m in St Ives). This rises to £8.6m in 2013 and £9.2m in 2015.

Total Available Expenditure in the Study Area

- 7.73 On this basis, Table 4A indicates that the total available convenience expenditure in the study area is currently assessed to be £323.6m. This is forecast to grow by 5.2% to £340.5m in 2013 and by 8.9% to £352.3m in 2015. The corresponding figure for the catchment area is £57.9m, rising by 5.7% to £61.2m in 2013 and by 9.7% to £63.5m in 2015.
- 7.74 Table 4B shows that the total available comparison expenditure in the study area is currently assessed to be £467.8m. This is forecast to increase by 9% to £509.8m in 2013 and by 16.4% to £544.7m in 2015. The corresponding figure for the catchment area is £79.4m, rising by 9.6% to £86.8m in 2013 and by 16.2% to £92.3m in 2015.
- 7.75 Therefore, because of rising population and expenditure per capita and increasing tourist expenditure, the underlying position within the study and catchment areas is one in which available convenience and comparison goods expenditure is expected to increase.

Turnover of Existing Facilities

- 7.76 Based on the WYG household survey, Table 5 demonstrates where consumers shop for convenience goods in the PCA and across the study area. Table 6 converts the percentage figures and patterns shown in Table 5 to monetary values. This is achieved using a standard methodology, taking into account the total available expenditure in the study area.
- 7.77 Table 6 illustrates that existing retailers in the catchment area have a catchment area derived convenience turnover of £29.3m. The majority of convenience spending is at the Tesco, St Ives (£11.1m). Co-Op at Copper Terrace, Hayle attracts £6.2m of expenditure generated and spent in the study area. Lidl, Carwin Rise, Hayle attracts £5.0m. The M&S at West Cornwall Shopping Park has a study area derived convenience turnover of £3.1m.
- 7.78 As noted in Section 3, the level of expenditure 'leakage' from the catchment area is clearly illustrated in these results. The household survey results indicate that, at present, 50.6% of convenience retail expenditure generated in the catchment area is spent at existing retail facilities in the area. That is, almost half (49.4%) of retail expenditure generated in the catchment area is not currently available to convenience retailers in the area as it is being spent in competing facilities further afield.
- 7.79 Leakage (and inflow) is a common trend in examining retail expenditure across defined geographic areas and occurs owing to a number of factors. The geographical characteristics

of an area, proximity to competing retail facilities and the potential to link trips with journeys to work all influence decisions by individual shoppers on which destination to visit.

- 7.80 Turning to the study area derived convenience turnover of existing facilities, Table 6 illustrates that existing retailers in the catchment area do draw some expenditure from outside the area. The combined study area derived convenience turnover of retailer in the catchment area is £34.7m. The majority of convenience spending is at the Tesco, St Ives (£11.1m). Co-Op at Copper Terrace, Hayle attracts £6.6 of expenditure generated and spent in the study area. Lidl, Carwin Rise, Hayle attracts £6.8m. The M&S at West Cornwall Shopping Park has a study area derived turnover of £6.2m.

Trading Assessment

- 7.81 This section of the report considers the potential impact of the proposed Sainsbury's store on the patterns of retail expenditure in the surrounding area. In accordance with PPS4 (Policy EC14.7), the potential impact of the proposal is tested at 2015. Table 7 considers the affects the proposed foodstore could have on the turnover of Hayle Town Centre and other retailers in the catchment area.

Convenience and Comparison Expenditure Patters at 2010 (Column 1 of Table 7)

- 7.82 Taking into account shopping patterns in the study area identified in the household survey, column 1 of Table 7 sets out the current turnover of retailers in the catchment area. For transparency and to be robust, study area derived convenience turnover figures for existing retailers are carried forward from Table 6. Comparison turnover figures are based on benchmark company average figures (Verdict, 2008 prices).
- 7.83 In making this judgement, we have had regard to GVA March 2010 Assessment of our previous Retail Assessment. In particular, we have taken into account the finding at paragraph 3.38 of the assessment that the comparison goods turnover levels of existing stores provided within Table 5 (Appendix 8) of the Strategic Perspectives Retail Assessment (December 2009) are a reasonable starting point for the impact assessment. That assessment supported the withdrawn ING Real Estate Development application at South Quay, Hayle Harbour.
- 7.84 Consistent with the approach adopted throughout this assessment, we have estimated likely study area derived comparison goods turnover of existing retailers, taking account of our survey analysis and benchmark average, the PRS and the GVA March 2010 Assessment. On this basis, our estimated comparison goods turnover for existing retailers is as follows:

Table 7.2: Comparison Goods Turnover of Existing Retailers in the Catchment Area

Facility	Turnover (£m)
Co-op, Copper Terrace, Hayle	0.1
Other, Hayle Town Centre	3.1
Lidl, Carwin Rise, Hayle	1.1
M&S, West Cornwall Shopping Centre	8.1
Other Out-of-centre, Hayle	9.2
St Ives Town Centre	10.1
Tesco, St Ives	2.9
Other, St Ives	0.4

Source: Table 6, Appendix F

- 7.85 Taking the above into account, column 1 of Table 10 indicates that the current total turnover of convenience and comparison goods retailers in the catchment area is assessed to be £69.6m. Of this figure, facilities in Hayle Town Centre currently turnover £10.4m (£6.7m Co-op, Copper Terrace and £3.7m 'other'). The corresponding figure for out-of-centre provision in Hayle is £31.5m (£7.9m Lidl, £14.3m M&A and £9.3m 'other'). The turnover figure for St Ives Town Centre is £11.8m, with out-of-centre provision at £15.7m.
- 7.86 In direct response to the GVA March 2010 Assessment, Table 78 sets out the convenience and comparison turnover of existing retailers. This division is continued throughout Table 7 and the trading assessment as a whole, as set out below.
- 7.87 Column 2 of Table 7 projects these figures forward to 2015. In projecting the turnover figures forward to 2015, we adopt the assumption that existing facilities will benefit on a pro rata basis from the increase in study area generated expenditure between 2010 and 2015. On this basis, the total turnover of existing facilities in the catchment is forecast to rise to £78.5m in 2015.



7.88 Columns 3 and 4 of Table 7 analyse the pattern of trade draw to the proposed Sainsbury's scheme, as follows:

- 22% (£6.2m) from existing retail facilities in Zone 3, including 4% (£1.2m) from town centre retailers and 18% (£5.0m) from out of centre retailers
- 1% (£0.3m) from St Ives Town Centre and 17% (£4.7m) from out of centre retailers in Zone 4
- 60% (£16.8m) from competing facilities outside of the PCA but within the study area (i.e. Zones 1 and 4 – 8). The competing facilities and the level of trade draw are identified in Table 7, as requested by the GVA March 2010 Assessment.

7.89 This pattern of trade draw is based on careful scrutiny of the existing retail offer, shopping patterns in the study area and the function of individual retail facilities, and the relative accessibility of existing facilities. It takes into account the scale and form of the proposed new store and nature of existing provision. The level of trade diversion is based on the generally acknowledged principles that:

- the effect of the Sainsbury's store on competing foodstores will generally be proportionate to their distance from the proposed store. Numerous surveys of food shopping patterns throughout the UK suggest that customers will generally go to the store that is nearest to their place of residence which can provide for their particular shopping needs; and
- Large foodstores tend to compete on a like with like basis for main food shopping, such that those stores which have large areas of dedicated surface level car parking, provide large numbers of customer trolleys and have a full range of in-store customer facilities and generous aisles, will tend to compete directly for car borne bulk food trade.

7.90 This level of 'claw back' and overall assessment of trade draw is considered robust based on the strength, nature and location of competing facilities in the study area, shopping patterns demonstrated in the WYG household survey and the premise that the proposal will deliver the step change in retail provision in Hayle through the introduction of quality main food shopping floorspace in the town.

**Assessed Level of Impact**

- 7.91 Prevailing policy in relation to retail impact requires that outstanding commitments should be taken into account in considering the trading effects of retail development proposals. It has been verbally confirmed by Cornwall Council that there are no outstanding foodstore commitments in the PCA and that it is not appropriate to consider the Harbourside regeneration scheme that benefits from a resolution to grant consent because it didn't include a foodstore. The permitted Tesco extension and new Sainsbury's store in Helston (Zone 7) have been taken into account. The assessment adopts the assumption that when brought forward together, the stores and the application proposal would result in no alteration in market share from the respective Zones.
- 7.92 Columns 8 and 9 illustrate the impact of the proposed Sainsbury's store on the calculated 2015 turnover of centres/retail facilities in the Study Area.
- 7.93 The proposed development is assessed to have a 10.3% impact on the 2015 turnover of Hayle Town Centre as a whole – the appropriate test of impact set out in PPS4. The corresponding figure for St Ives Town Centre is 2.1%. It is therefore assessed that the proposal will not lead to a significant adverse impact on in-centre turnover of the two town centres in the catchment area.
- 7.94 The impact of the proposed development will be off-set by the substantial level of projected growth in total available expenditure in the study area from 2010 to 2015. Columns 6 and 7 of Table 7 calculate the change in turnover of retail facilities in the PCA over the period 2010-2015, following the opening of the proposed Sainsbury's store.
- 7.95 Turning firstly to the facilities in Hayle, columns 6 and 7 of Table 7 indicate that the turnover of the centre as a whole will decrease slightly (0.3%) over this period, taking into account the likely trade draw of the proposed store. St Ives Town Centre will experience a 12.9% (£1.5m) growth in total turnover over the same period. As such, the proposal will not result in any undue detrimental decrease in turnover over this period.

a) Existing, Committed and Planned Investment in Centres

- 7.96 Paragraph 7.71 of the CLG Practice Guidance on Need, Impact and Sequential Approach notes that where the local planning authority and/or private sector has identified town centre development opportunities and is actively progressing them, it will be important to assess the effect of any out-of-centre proposal on them. Key considerations include: the stage at which the town centre proposal has reached; to what degree investment is



committed; and the level of significance of direct and indirect impact.

- 7.97 The major public and private sector investment currently planned in Hayle is the Harbourside regeneration. The former Penwith District Council granted outline planning consent for a comprehensive mixed use development in March 2009 for the entire site, subject to completing a s106 agreement. This scheme does not make specific provision for a foodstore, although it does contain a significant amount of food, drink and retail floorspace, together with residential, leisure and employment uses.
- 7.98 It is considered that the proposed Sainsbury's foodstore and the Harbourside development are very different in nature, scale, role and function. Their clear differences in nature and function, and the target consumer base of the two schemes are particularly important in considering the potential for either scheme to impact on the other. The Harbourside proposal does not include a bulk main food shopping facility and is not intended to provide this function. The application proposal does just that and will no therefore not compete directly with the central scheme on a like for like basis.
- 7.99 On this basis, it is considered unlikely that the Sainsbury's foodstore would prejudice public or private sector investment in the Harbourside development in any way, as far as the approved scheme is concerned and we therefore reject GVA's comments for the reasons set out above.
- 7.100 It is acknowledged that an alternative scheme (referred to above) involving a foodstore is being designed for South Quay. However and as noted above, we conclude that the Harbourside is not suitable for a foodstore development. Therefore, we stand by our assessment that the proposed Sainsbury's development will not have any undue impact on the promoted investment in the redevelopment of Hayle Harbourside.

b) Town Centre Vitality and Viability

- 7.101 The CLG Practice Guidance on Need, Impact and Sequential Approach notes that taken as a whole, consideration of the effects on the development plan strategy and impact on the town centre turnover provide a good indication of the overall effects of a proposal on the vitality and viability of town centres. The guidance also noted that significant levels of trade diversion from a centre, or key sectors, can seriously undermine its vitality and viability resulting in reduced footfall and increased vacancies.
- 7.102 At this point, it is important to note the findings of the vitality and viability assessment of Hayle and St Ives Town Centres. A detailed assessment of the town centres is included at



Appendix G. Any impact on the vitality and viability of the centres must be considered in the context of the strength and health of the town centres in the catchment area when assessed against PPS4 indicators.

- 7.103 The centres perform well against the vitality and viability indicators of PPS4. Hayle has a good range of independent convenience and comparison goods retailers, vacancy levels below the national average in Foundry and Copperhouse and good levels of pedestrian footfall. St Ives is a very busy centre with a wide-ranging offer underpinned by tourism. The town centre contains a variety of national multiples and local independent traders, with low vacancy rates and is considered to be very healthy when assessed against PPS4 indicators.
- 7.104 The centres fulfil a predominantly top-up food shopping function. This is clearly reflected in the nature of existing convenience retailers including the Co-op at Copperhouse, Hayle, the two Co-op stores in St Ives Town Centre and the variety of independent retailers in the two centres. The market share of the town centres for convenience goods described earlier in this section (and Section 3) also illustrates the top-up function of the town centres.
- 7.105 As noted above, existing provision in the town centres are also orientated towards the tourist sector. Tourism plays an important role in the diversity of retail provision in the town centres, their attraction and overall vitality and viability. Committed development such as the redevelopment of Hayle Harbourside will strengthen the vitality and viability of Hayle Town Centre and the attraction of the area as a whole.
- 7.106 In the context of this function and nature of existing retail facilities, it is considered that the proposed Sainsbury's store will complement town centre provision rather than result in undue direct competition. A new main food shopping facility will contribute to the existing retail offer, serving both local residents and tourists alike. In turn, this is likely to claw back a significant proportion of expenditure currently being 'leaked' from the area and attract a greater proportion of tourists.
- 7.107 The lack of direct competition and the level of trade draw from the town centres is not anticipated to have any significant adverse impact on town centre footfall, the mix of uses or the level of vacancy. The centres are likely to continue to attract people for multiple reasons, including shopping. On this basis, it is considered that the proposed development is not likely to lead to significant adverse impact on the vitality and viability of either Hayle or St Ives.



Choice and Competition

- 7.108 Notwithstanding the above strengths of the town, Sainsbury's has identified a significant deficiency in provision for a high quality bulk main food shopping facilities. Hayle residents do not currently have access to a local foodstore that caters fully for their weekly food shopping needs. This is an important deficiency and unusual for a town of Hayle's size and position in the spatial settlement hierarchy. The existing retail offer is failing to meet the needs of the resident and hinterland population for main food shopping.
- 7.109 The existing lack of choice and competition in the bulk main food shopping sector is resulting in a very high proportion (49.4%) of expenditure generated in the catchment area being 'leaking' to competing facilities further afield. Residents of the catchment area are currently travelling to large out-of-centre retail facilities in Penzance and Camborne (among others) to do their main bulk food shopping. This trend and very high level of leakage is both inconvenient to the shopper and unsustainable. It clearly contradicts prevailing policy in relation to the distribution of services, increased self-containment in main towns and the underlying principles of sustainability.
- 7.110 The proposed development would be capable of offering the genuine choice and competition that is currently missing for Hayle residents. It would be consistent in terms of scale with competing provision in settlements such as Penzance and Camborne. In turn, this would help increase Hayle's self-containment in terms of main food shopping provision, distribution of service facilities and the associated reduction in the need to travel to competing facilities in other towns. In turn, this would help make shopping trips more sustainable
- 7.111 The addition of a high quality new Sainsbury's not currently represented in the area would increase the attraction of Hayle as a retail destination, clawing back a significant proportion of leaked expenditure. By remedying the qualitative deficiency in existing provision, it will contribute towards the delivery of the step change and investment in retail facilities in Hayle recommended in the PRS. It will raise Hayle's profile, being visible and conveniently accessible from the A30, and will support the tourist sector by attracting more visitors and pass by trade to Hayle and the surrounding area. A proportion of shoppers attracted to the store are also likely to carry out linked shopping trips to the adjacent West Cornwall Shopping Park and the town centre, increasing trade and supporting the vitality and viability of established centres.

c) Allocated Sites outside Town Centres

7.112 As noted above, there are no out-of-centre allocated sites in Hayle or St Ives.

d) Appropriate Scale

- 7.113 This assessment has analysed the size, role and function of Hayle in the sub-regional hierarchy. We have assessed the nature of existing provision and found a significant deficiency in the main food shopping sector, resulting in the town not serving its identified function for this purpose. The scale of the proposed development has been tailored in this context and the opportunity to provide a new facility that addresses limitations in existing provision.
- 7.114 The need to address this deficiency is specifically recognised in the PRS, which provides for new convenience retail development amounting to 1,500 sq m net by 2012, rising to 1,750 sq m net by 2021. Whilst this is acknowledged, it is considered that such provision would not provide the 'step change' or scale of provision required to address the deficiency and compete effectively with larger out-of-centre facilities in neighbouring towns. A foodstore of this size would be more likely to compete on a like for like basis with Co-Op, Copperhouse Terrace. Such a scenario would result in more direct trading impact on the established store and continued high levels of leakage of main food shopping expenditure to facilities outside of Hayle.
- 7.115 The proposed Sainsbury's store is of a scale necessary to provide a main food shopping facility capable of competing effectively with larger out-of-centre stores currently drawing trade out of the catchment area. The proposed foodstore is broadly consistent in scale with existing main food stores in Camborne and Penzance, and other settlements in the study area with which it would be expected to compete for trade. These include the Tesco stores in Camborne and Penzance, Morrisons in Penzance, Tesco in Redruth, the committed Sainsbury's and soon to be extended Tesco in Helston and Morrisons in Pool. The Sainsbury's store will stock a similar range of food and ancillary non-food goods to these competing stores, ensuring direct competition through the provision of appropriate choice.
- 7.116 A store of this scale, which is comparative to existing provision in similar towns across the study area, would claw back a significant proportion of leaked expenditure. It is considered reasonable that the proposal would see convenience expenditure retention in the catchment area rising from the currently unsustainably low level of 50.6% to around 70% retention.
- 7.117 The proposed Sainsbury's would deliver the step change in Hayle's convenience shopping offer recommended by the PRS. In this scenario, an increase in expenditure retention in the



catchment area to 70% is both reasonable and appropriate, in line with prevailing policy. In comparison to level of retention in other towns in the Study Area based on the results of the household survey, including Penzance (90%) and Camborne (75%), this level of retention is considered reasonable. This is further emphasised when assessing the level of provision in these towns relative to Hayle, including the Tesco and Morrisons in Penzance and Camborne (taking account of Morrisons in Pool).

- 7.118 On this basis, it is considered that the proposed development is of an appropriate scale in Hayle.

e) Locally Important Impacts on Centres as defined by the LPA

- 7.119 Discussions with the Council have not identified any locally important impacts on existing centres. Therefore, there is no clear evidence that the proposal will lead to any significant adverse locally important impact.



8.0 CONCLUSIONS

- 8.01 In light of the foregoing evidence, it is concluded that the proposed development is in accordance with Policy EC17.1 a) and b) of PPS4 and the relevant provisions of the development plan.
- 8.02 A sequential site assessment has been carried out in line with Policy EC15 of PPS4, concluding that all identified potential sites are unsuitable, unviable or unavailable for the proposed development. The proposed development therefore complies with Policy EC17.1 a) of PPS4.
- 8.03 The assessment has demonstrated compliance with Policy EC17.1 b) of PPS4 in concluding that there is no clear evidence that the proposal is likely to lead to significant adverse impacts in terms of any one of the impacts set out in policies EC10.2 and EC16.1 of PPS4.
- 8.04 In line with Policy EC17.2 of PPS4, the assessment has analysed the positive and negative impacts of the proposed development in terms of policies EC10.2 and EC16.1, concluding:
- The proposal has been planned over the lifetime of the development to limit carbon dioxide emissions and minimise vulnerability and provide resilient to, climate change
 - The site is accessible by a choice of means of transport and the proposed development will result in linked trips to the West Cornwall Shopping Park and Hayle leading to travel and carbon savings
 - The scheme benefits from a carefully considered and high quality inclusive design
 - The proposal will have a positive impact in contributing to the economic regeneration of Hayle and the surrounding area
 - Up to 270 new retail jobs offered on a flexible basis in including a mix of full and part time positions including high quality training and career development opportunities will be created as a direct of the proposal, which will contribute significantly to local employment
 - The proposal is significantly different in nature to the planned investment at Hayle Harbourside. It will complement the scheme to the benefit of retail provision in Hayle. There is no evidence of any significant impact on this or any other existing,



committed, or planned public and private investment in Hayle Town Centre or other centres in the catchment area

- In the context of current and future available resident and tourist retail expenditure in the study area, the proposal will not adversely impact on in-centre turnover of Hayle or St Ives Town Centres
- The proposal will not adversely impact on the vitality and viability of Hayle or St Ives Town Centres. The scheme will significantly increase consumer choice by delivering the required 'step change' in retail provision and broadening the range and quality of retail offer in the town
- There are no sequentially preferable sites compared to the Sainsbury's site
- The proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres, and will contribute towards Hayle fulfilling its function as an important main town capable of meeting the needs of its resident and hinterland populations
- There are no locally important impacts in the context of Policy EC3.1.e.

8.05 In light of the foregoing analysis, it is concluded that the proposal is consistent with the requirements of current planning policy set out in PPS4. The proposal accords with the sequential approach and there is no evidence of any significant adverse impacts associated with the development. Strong positive impacts in favour of the proposal include, carbon emissions and climate change, accessibility, job creation, increased consumer choice and effective competition in the local retail market, and the increased attraction of Hayle as a retail shopping destination.