

Heritage Impact Assessment of Notional Supermarket Developments at

Hayle Harbour, Hayle, Cornwall

A Report

for

Sainsbury's Supermarkets Ltd and
Cranford (Hayle) LLP



Advice for the historic environment

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1 INTRODUCTION

1.1 Purpose of report

In its letter of 10th July 2009 to WYG Planning & Design, Cornwall Council identified seven sequentially preferable sites that should be considered by the applicant as part of its sequential site assessment. Four of these sites (South Quay, Jewsons (or Carnsew Quay), South and Carnsew Quays combined, and North Quay) are situated on Hayle Harbourside within the Cornwall and West Devon Mining Landscape World Heritage Site. Heritage Places was instructed by WYG on 5th May 2010 to provide a technical assessment of their suitability in heritage terms for a foodstore development as part of the applicant's wider consideration of suitability. Accordingly, this report provides an assessment of the impact of development of a supermarket with ancillary servicing and car parking at North, South and Carnsew Quays in Hayle Harbour on designated and undesignated heritage assets and their settings within the area. These assets include the inscribed World Heritage Site [WHS], a scheduled ancient monument [SAM], listed buildings, and a conservation area.

As noted above, North, South and Carnsew Quays are the principal sites within the Harbour and its environs that are of sufficient area to accommodate a supermarket building and its ancillary servicing and car parking. Specific proposals of the kind have been generated recently for both South Quay and Carnsew Quay; to date, this has not been the case for North Quay.

Although these recent proposals for South Quay and Carnsew Quay have helped to inform this impact assessment, in order to maintain consistency of approach across the three sites, the supermarket development is assumed throughout to be of uncertain, but modern design, being of approximately 36,000 square feet gross area and providing in the region of 20,000 square feet of net retailing space. It has been assumed that this would require car parking provision of approximately 225 spaces.

1.2 Methodology and sources of information

This assessment has relied upon:

- A site visit made by the author of this report on 10th May 2010;
- Various recent evaluations of Hayle's historic environment and, most particularly, the detailed '*Hayle Historic Assessment*' prepared by the Cornwall Archaeological Unit on behalf of English Heritage in 2000, which was also adopted as part of the Cornwall Industrial Settlements Initiative (CISI) by English Heritage, Cornwall County Council and Penwith District Council, and '*Historic Characterisation for Regeneration: Hayle*', prepared by the Historic Environment Service of Cornwall County Council as part of the Cornwall & Scilly Urban Survey (CSUS) study programme in 2005;
- The Nomination Document and Management Plan for the Cornwall and West Devon Mining Landscape World Heritage Site prepared in 2005 [referenced in this report as WHSND and WHSMP, respectively];
- Planning Policy Statement 5, Government Circular 07/09, associated guidance from Government Departments and English Heritage, and relevant Acts of Parliament;
- Copy correspondence relating to recent planning applications provided by WYG and/or available as web pages during May 2010.

The assessment looks in turn at the impact of the notional supermarket development on the Port of Hayle component of the Cornwall and West Devon Mining Landscape World Heritage Site, the one scheduled ancient monument in the environs of Hayle Harbour (known as the Cunaide Stone) along with other undesignated monuments and the archaeological potential of North, South and Carnsew Quays, the various listed buildings and structures in the locality, and Hayle Conservation Area. Perhaps inevitably, there is some overlap in the assessment of impact for some of these heritage assets – where this occurs, the principal discussion of the issues is undertaken where it first arises and is not repeated in subsequent sections.

Panoramic images of some of the key local views around the Harbour are provided at the end of the report.

2 EXECUTIVE SUMMARY

- 2.1 This report provides an assessment of the impact on designated and undesignated heritage assets and their settings of development of a supermarket with a gross area of 36,000 square feet, together with ancillary servicing and parking for approximately 225 cars at North, South and Carnsew Quays in Hayle Harbour. These assets include an inscribed World Heritage Site, a scheduled ancient monument, listed buildings and a conservation area. North Quay, South Quay and Carnsew Quay are the principal sites around the Harbour that are of sufficient area to accommodate a supermarket building of this size and its ancillary servicing and car parking.
- 2.2 The report concludes that a supermarket development of the specified scale located at any one of these sites would have an undesirable and major deleterious impact upon the historic environment and upon the Harbour's significant heritage assets.
- 2.3 In reaching this conclusion the report finds inter alia that:
- A development of this nature and scale would be profoundly damaging to the outstanding universal value of the World Heritage Site and to the character and appreciation of the key physical attributes of the Harbour. It would undermine visual coherence of the historic environment, lead to major loss of local distinctiveness and character, prevent critical enhancement of the historic integrity of various assets, and impact detrimentally on key views. Lying centrally within the Port of Hayle WHS, this would be extremely unfortunate for its wider harmful effect.
 - Almost by definition, area regeneration in Hayle Harbour has the potential to affect the outstanding universal value of the World Heritage Site. On that basis, each and every proposal for a development scheme of substance in the Harbour area should be referred to UNESCO's World Heritage Committee before the planning application is determined to allow them to *'assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved'*, as is required by Government guidance issued in 2009.
 - The lesson from numerous cases in recent years is that UNESCO will take action against the Government to enforce protection of the Cornwall and West Devon Mining Landscape WHS, if it determines that inappropriate development has been permitted that places the Site's outstanding universal value under threat. The finding of this report is that UNESCO and its advisor, ICOMOS, would find a supermarket development of the specified scale on one of the three sites in Hayle Harbour to be inappropriate in this way.
 - The supermarket development would have a neutral impact upon the one scheduled ancient monument in the environs of the Harbour. However, although unscheduled, the archaeological deposits that lie under the surface of the quaysides are potentially rich in value and are undoubtedly of national importance. The Government's recent policy statement, PPS5, makes clear that unscheduled monuments which are of national importance should be treated in planning terms as if they were in fact designated. PPS5 makes clear that substantial harm to the significance of a scheduled ancient monument should be a *'wholly exceptional'* occurrence. The report finds that a supermarket development would jeopardise conservation of the archaeological significance of North, South and Carnsew Quays.
 - The character of listed buildings and their settings on North and Carnsew Quays and of the listed South Quay and Carnsew Quay themselves would be seriously affected by large scale development in their vicinity. This mirrors the findings of a planning appeal in January 2009 affecting Carnsew Quay, where the Inspector concluded that a design (in that case for residential apartments) that does not *'respect traditional local patterns of development and would not be integrated with its*

surroundings' would be unacceptably damaging to the conservation of the listed timber store on the Quay.

- Such a supermarket development in the Harbour arena would have a serious negative impact on the designated Hayle Conservation Area, damaging its character, local distinctiveness and key views in to, out from, along and across the Quays.

2.4 Whilst it is accepted that Hayle Harbour urgently needs regeneration, it is vital for the survival of Hayle's important historic environment that such regeneration is heritage-based and respects local traditions and distinctiveness. A supermarket development is simply not compatible with these criteria. Hayle Harbour is an unsuitable location for development of this sort on heritage grounds.

3 ASSESSMENT OF HERITAGE IMPACTS

3.1 World Heritage Site

Background to analysis, including the Port of Hayle's outstanding universal value

The Cornwall and West Devon Mining Landscape was inscribed as a World Heritage Site [WHS] in 2006. It comprises a coherent series of ten highly distinctive cultural landscapes, of which the Port of Hayle (site A2 in the WHS Nomination Document) is one. In justifying the nomination bid, these ten areas were described as being *'the best examples of surviving mining cultural landscapes which also remain free from the adverse effects of development. They also represent the most significant areas in terms of industrial history'* [WHSNB; Section 2c; pg 38].

Hayle Harbour lies in the centre of the Port of Hayle WHS. As the 2005 Management Plan notes, *'much of Hayle's harbour infrastructure survives'* [WHSMP; pg 92]. It also notes that existing statutory and other protection *'does not adequately reflect'* the importance of the Port of Hayle.

In the Nomination Document's 'Description of Property' [WHSND; Section 3a; pg 77ff], the Hayle WHS is described as including *'the principal surviving historic fabric of the largest fully integrated mining port and steam engine manufacturing centre anywhere in Britain'*. It notes that *'both the land and sea transport infrastructure...survives in a coherent form'* with its *'extensive quays and wharves...largely intact. They clearly define the character of the broad open shape of one of Europe's most outstanding estuarine settings'* [WHSND; Section 3a; pg 78].

In seeking inscription through the nomination bid to UNESCO, the WHS Bid Partnership – formed of 75 organisations, including the local planning authority for Hayle and Cornwall County Council – made a commitment that through its management it would:

- *'[Deliver] conservation of the outstanding universal value [of the WHS];*
- *Recognise that this is a distinctive living landscape which continues to evolve;*
- *Promote a sustainable approach that integrates conservation with regeneration, and the needs of communities with visitors'* [WHSMP; Section 1; pg 2].

and, more specifically as part of its long-term management approach, it would:

- *'Protect, conserve and enhance the historical authenticity, integrity and historic character of the Site for current and future generations*
- *Promote opportunities within the Site for heritage-led regeneration'* [ibid].

Modern conservation management takes a people-oriented approach that bases decision-making and care on an understanding of why society values a piece of heritage (be it, for instance, a medieval or modernist building, a K1 telephone kiosk, an illuminated manuscript, an entire conservation area or a serial World Heritage Site) and how that value can be damaged or lost. It seeks at all times to manage change so as to protect and enhance the values that communities ascribe to an asset. Where 'living' World Heritage Sites are involved, the range of values that are present include, but are certainly not limited to, what is termed in WHS jargon the Site's 'outstanding universal value' [or 'OUV']. As a pre-requisite of inscription as a World Heritage Site, UNESCO demands that the OUV is protected permanently. This is non-negotiable. World Heritage Sites

that have had their OUV badly compromised or destroyed are liable to be removed from the World Heritage Site List.

Moreover, Paragraph 8 of the Government's Planning Circular 07/09 – '*Circular on Protection of World Heritage Sites*' - for England states that:

'The outstanding universal value of a World Heritage Site indicates its importance as a key material consideration to be taken into account by the relevant authorities in determining planning and related applications and by the Secretary of State in determining cases on appeal or following call in. It is therefore essential that policy frameworks at all levels recognise the need to protect the outstanding universal value of World Heritage Sites. The main objective should be the protection of each World Heritage Site through conservation and preservation of its outstanding universal value.'

The OUV for the Cornwall and West Devon Mining Landscape was defined in the Nomination Document and Management Plan as being:

'The Cornwall and West Devon Mining Landscape was transformed during the period 1700-1914 by early industrial development that made a key contribution to the evolution of an industrialised economy and society in the United Kingdom, and throughout the world. Its outstanding survival, in a coherent series of highly distinctive cultural landscapes, is testimony to this achievement' [WHSND; Section 2, pg 21]

In hindsight, it is unfortunate that, although founded on a general statement of significance for the complete WHS, the OUV and key physical attributes of the individual constituent cultural landscapes were left undefined in the nomination documentation. This means that these have to be derived and collated from the content of the principal and referenced documents, such as the Nomination Document, the Management Plan and the CISI/CAU study of Hayle (the 2000 Hayle Historical Assessment) to which specific reference is made [WHSND; Section 3c; pg 165], in order to understand the nature of the outstanding universal value that is to be protected and preserved uncompromised.

The Nomination Document makes clear that the Port of Hayle's value as part of the WHS was bound up in three of seven principal components '*that impart the singular character of the Cornish mining landscape*' [WHSND; Section 2c; pg 38, and Section 3; pg 50], namely: (C2) Mine transport; (C3) Ancillary industries; and, (C4) Mining settlements and social infrastructure.

Since inscription of the WHS, various semi-formal and informal attempts have been made at setting out the OUV for the Port of Hayle and its related key physical attributes, including by Cornwall County Council in August 2007 and most recently by ICOMOS-UK in its letter to Cornwall Council dated 31st January 2010. Since, in the event of the need for advice on the outstanding universal value of a cultural World Heritage Site, UNESCO turns to ICOMOS, in my opinion, greater weight should be placed on ICOMOS-UK's assessment of OUV than others. That, however, does not mean it should simply be taken at face value without reassessment. Having looked in detail at ICOMOS-UK's OUV for Hayle, in my view, it is appropriate except in one respect. The Nomination Document, as we have seen, speaks of the Harbour's context as '*one of Europe's most outstanding estuarine settings*', whilst the two detailed assessments of Hayle's historic environment, the CISI/CAU and CSUS studies of 2000 and 2005 respectively, repeatedly stress the importance of key views into, out of and across the Harbour (for instance, see CISI/CAU pages 9, 15, 20, 60-71, and CSUS pages 3, 4, 14, 15, 39-40, 72-4). Indeed, the latter stipulates that, as key principles, all regeneration in Hayle's historic environment should:

- '*Recognise Hayle's historic environment as a major asset and distinguishing element in its distinctive sense of place. Maintaining the elements which create and sustain this special character, ensuring their full use and enhancing them in the long-term are, therefore, key actions for all regeneration.*

- *Respect and safeguard the fundamental importance of the natural setting and physical topography to the character of Hayle, particularly views across the estuary and harbour area...* [CSUS, pg 41].

The OUV set out by ICOMOS-UK tends to underplay the importance of these views, leaving their mention to a subsidiary clause alone. In my view, on this point, the OUV needs to be strengthened. This conclusion is supported by the OUV statement for the Hayle Area WHS, prepared by Cornwall County Council in 2007, which speaks repeatedly of the importance of extensive views to Lelant and the estuary entrance, identifies vistas out through the estuary as one of the ‘*principal sites*’ of the WHS, and specifically denotes views out along the quays as one of its ‘*icons*’. Taken together, therefore, I am of the opinion that the outstanding universal value of Hayle Harbour, adopting and adapting the wording of ICOMOS-UK, is built on the following key attributes that must be protected and preserved:

- The assembly of quays, quay walls, docking areas and quayside platforms or decks where goods were loaded and unloaded;
- Tramways and railways; linear track ways in the landscape and townscape and the remains of tracks including granite pad stones which held iron rails for horse drawn ‘tramways’;
- The fishing port;
- Large man-made sluicing ponds and sluices, with the associated infrastructure of pond walls, sluice gates etc;
- Shipbuilding yard for Harvey’s iron boats;
- Estuarine landscape:
 - Narrow funnel exit from harbour to sea; harbour in bowl between sand dunes; strong contrast between industry and surrounding ‘natural’ landscape – with in places abrupt change between the two;
- Overall readability of much of the harbour landscape in terms of spatial arrangements:
 - Open character and low-height buildings that allow views between the docks, down and across Copperhouse pool, across Carnsew Pool, etc.
- Key intimate and wide ranging views across the WHS, including those both inward and outward along the estuary and its creeks.

The WHS management plan envisaged that local authorities would prepare – or, at the very least, facilitate preparation of – development briefs to guide and properly inform proposals for the more sensitive or ‘difficult’ locations within the WHS [WHSMP Section 4.3.7: Achieving sustainable development and heritage-led regeneration, pg 132; WHSMP Table 10: Strategic Actions – Item 5, pg 154; WHSMP Summary, pg 22]. In my opinion, Hayle Harbour is without doubt a most sensitive location within the WHS, which warranted (and still warrants) provision of one or more detailed development briefs by the local planning authority to guide design proposals. Given the importance of this location to the overall well-being of the World Heritage Site, UNESCO would unquestionably anticipate that regeneration in the Harbour would be heritage-based in its driving principles and would preserve the Site’s OUV, as set out above. The absence of a development brief for the Harbour is a serious oversight and a WHS management failure.

Impact assessment

All analyses of Hayle conclude what is obvious – the Harbour in its estuarine setting is central to the character and integrity of its historic environment. Topographically within the Port of Hayle WHS that is patently the case, as it lies at the heart of the Site. Any regenerative initiative affecting the Harbour must be regarded as being pivotal in its importance and for its potential influence on the character of the remainder. If redevelopment of the historic Harbour is not heritage-based, the Management Plan’s core intention that it should ‘*Promote a sustainable approach that integrates conservation with regeneration*’ will fail. Quite simply,

if the Harbour is re-fashioned without regard to heritage-based principles, any such approach applied on lesser sites will be little more than 'window dressing' around the edges.

The fundamental dilemma is that it is difficult to envisage how any supermarket development providing 20,000 square feet of net retailing floor space (say, 36,000 sq.ft gross area) and around 225 car parking spaces in its immediate environs can be heritage-based in its planning and design principles, especially as a stand alone development rather than as an integral part of a single comprehensive regenerative development scheme. Offering to repair affected historic fabric, such as the associated dock walls, as a *quid pro quo* for planning consent for what is otherwise a straightforward commercial development does not constitute a heritage-based regenerative approach.

To a significant degree, the historic quays of Hayle Harbour were open spaces. Where buildings did exist, they tended to be fairly low in height, of moderate footprint, and unassumingly local in character. This will be looked at below in more detail on a site-by-site basis. At this point, however, the general point should be noted that a single supermarket building, generating the levels of floor area previously identified, will be significantly out of scale in terms of both footprint and mass with any historic structures that existed around the Harbour and indeed, as English Heritage has noted of one (now withdrawn) proposal, '*with any other [existing] building in the immediate area*'. Once again, in such circumstances, heritage-based regeneration is a non-starter. Heritage-based regeneration must build from an appreciation of the characteristics of the historic environment. Whilst it is accepted that conservation of the historic environment is unlikely to happen without an economic driving force (as one applicant, ING, has noted), the conclusion of Cornwall County Council's own CSUS study is pertinent: '*One of the special features of Hayle is its large open harbour which, while huge in itself, is still dwarfed by the scale of the estuary.... While the broad expanse of estuary, glimpses of open seascapes, areas of dunes and moorland and agricultural vistas give an impression of great space, in reality the landscape is small in scale with a limited capacity to absorb development*' [CSUS, pgs 14-5]. Regenerative development that will be respectful of the historic environment must work from that understanding; and, that is not consistent with the scale of development required for food retailing of this sort.

The impact of a supermarket development of this size on the character and key OUV attributes of each of three sites – North Quay, South Quay and Carnsew Quay – will now be considered.

North Quay

Historically, North Quay (formerly Riviere Quay) was largely open. For most of its history until the mid-20th century, there were few buildings on the quay, apart from stables, which survive in derelict condition and are listed, and small mineral 'hutches' or stores, as it was mainly in use as an ore store and for the importation of coal [CISI/CAU; Inventory - Asset 142, pg 36]. The large structures that dominated the northwestern end of North Quay from the mid-20th century belong to a period of little importance to the fundamental significance of the WHS.

In addition to the general points made above, which it should be noted are of real significance in relation to North Quay, a supermarket building and associated infrastructure anywhere on the quay front will have a major detrimental impact on key views up the estuary beside both East Quay and South Quay and across the estuary from Lelant and to its north. A supermarket at the foot of the hill on the site of the former Octel bromine plant could be more discrete, although still detrimental to some of these views, especially that across the estuary. The impact on the important view from Plantation to the south of the Harbour would be undesirable, although slightly more tolerable than alternative development sites.

South Quay

South Quay (also referred to as Penpol or Foundry Quay) is a long narrow peninsular wharf, constructed around 1819. The greater part of the Quay was free of buildings for much of the 19th century, the heyday of its use. By the mid-19th century, there was a scattering of relatively small buildings on its western side, interspersed by large spaces. Some infilling occurred between and beside these buildings over the next 25 years, without affecting the overall predominant character of the Quay, which, as the local authority's planning officer described in March 2010, was of *'fairly low, modestly sized buildings, with storage around the quay'*. Nothing of the overwhelming footprint or mass of a supermarket has ever stood on the quayside. Whilst some quay edges can be made to remain unobstructed and evident, the character of the Quay as a whole will reflect nothing of its historic interest. This is a major problem for the outstanding universal value of the Port of Hayle WHS component, as will be the loss of the depth and free space of quayside 'decks', where this occurs to make way for car parking, a service road, and flood defensive measures.

As prepared schemes for the site amply demonstrate, a supermarket of this specification will take up roughly three-quarters of the length of the peninsular Quay, and, given that it tapers markedly to the north at the furthest end from the access, it is almost inevitable that the supermarket and its infrastructure will dominate the entire character and form of South Quay. Views from every direction will be dramatically and most detrimentally affected. As one example of this, from Penpol Terrace - an important element of the WHS - the visible length of the Quay will be taken up by access and parking arrangements, the full length of the supermarket building and, most probably, the unsightly 'back' service yard as well (unless this can be placed so as to be obscured from sight from this direction by the main store structure). Ironically, the only part of the Quay that will be free of the supermarket, its infrastructure and paraphernalia will be the northernmost tip, which is less visible from Penpol than the rest of its length. How that tip will itself be developed with appropriate character, hidden in the lee of the supermarket and its essential infrastructure, is a matter of some concern. A small housing development could be accommodated on the remaining free area of the peninsula, which would have fine views northwards away from the supermarket. In all other respects, though, such a development would be dominated and, to a degree, blighted by the food store and its access, parking and servicing arrangements.

Depending upon design, at historic two to three storey height (including the Quay-wide additional 1.85 metre flood protection platform), a supermarket building sitting anywhere near to the quay edge would transform negatively the views along Penpol Creek from the north and south, increasing the total 'wall' height by perhaps three to four times or more that of the existing dock walls alone, according to tide. At the same time, as ICOMOS-UK has noted, its bulk would visually cut the basin in two, hiding the existence of the second (Carnsew) channel and much of its pool from Penpol. The impact of the supermarket would disfigure the historic environment in a fundamental way and greatly distort its reading and interpretation – quite simply, an unacceptable compromise to the Site's OUV.

The final matter for South Quay as a prospective site for this development concerns its historic integrity. Over the latter part of the 20th century, as the Quay declined, historic slipways were filled in and spoil was dumped in heaps on the quayside. This has degraded and damaged appreciation of the historic Harbour to the west of South Quay, obscuring the form of both South and Carnsew Quays and the former Harvey's dock, and narrowing Carnsew Channel. The WHS Nomination Document and its Management Plan were clear in making a commitment that WHS status would lead to the Site's outstanding universal value being enhanced wherever possible, and this was to include enrichment of the historical authenticity, integrity and historic character of the Site for current and future generations [see, for example, WHSMP, pg 2]. Arguably, the most fundamental components of the Port of Hayle's OUV are the assembly of quays, quay walls, docking areas and quayside platforms, along with Harvey's dock. Sustainable regeneration of Hayle Harbour that is respectful of its OUV

must seek to reinstate those key missing historic elements, lost through infilling in the 1960s and 70s. As one supermarket planning application for South Quay has already noted [ING, December 2009], *'loss of [development] land associated with [excavation and reinstatement of the slipways] would mean that there would not be enough space on site for a viable scheme to come forward'*. In the circumstances, that emphasis is entirely wrong. A supermarket development covering two-thirds to three-quarters of South Quay cannot accommodate critical enhancement of the quay's historic integrity – the conclusion must be, therefore, that this is plainly not a viable or acceptable location for a development of this nature in the WHS.

In summary, to locate a large supermarket on South Quay in the very centre of the estuarine and harbour 'arena', and thus in the heart of the WHS, would undermine visual coherence of the historic environment, lead to major loss of local distinctiveness and character, impact on key views, and seriously compromise the outstanding universal value of the World Heritage Site. Furthermore, it would prevent greater coherence being brought to the historic environment and (otherwise achievable) strengthening of the Site's OUV, which were specific aims and intentions of seeking WHS inscription in the first place.

Carnsew Quay

Today's Carnsew Quay is somewhat altered in shape from its 18th century origins and mid to late 19th century successor. On its inland side, the Quay was more substantially built over than either South or North Quay, although its waterfront was again largely free of buildings. By the end of the 19th century, the back of the Quay was covered with a saw mill and timber store, whilst part of the middle of the quayside was taken up by a terrace of houses. However, the remainder was essentially open space used for storage and transport of materials.

The existing Jewson's store, which occupies the Quay, is an unsightly development that damages appreciation of the very existence of a Quay from the roadside, and impacts badly on the setting of both the listed 19th century timber store alongside and the mound and Iron Age hillfort at Plantation, immediately to the south of the road. The Jewson's buildings also blight the foreground of the important expansive view of the Harbour and estuary from Plantation. However, the impact of the existing buildings is rather less than would be the case for a supermarket development of the kind under discussion. As an existing application [Cornwall Council ref. 10-0413-P] demonstrates, Carnsew Quay is hardly large enough to accommodate the 36,000 sq ft gross area of the supermarket and its car parking, servicing and access arrangements (see below for further discussion and Figures 7, 8 and 9 to the rear of the report). The result would be that Carnsew Quay would be overwhelmed as an important part of the historic environment by its new use.

Importantly, a historic slipway and part of the remains of Harvey's dock lie under the eastern side of today's Quay. The size of the supermarket development will again prevent the re-exposure and integration of these significant elements of the historic Harbour. This weakens the potential to sustain and enhance the outstanding universal value of the WHS, an important point in relation to Carnsew Quay which is less readily appreciated by the public than the other Quays.

As has already been implied, the supermarket development would cause further damage to the panoramic view across from the top of Plantation – a vista that should be central to thinking during visualisation of the regeneration of the Harbour. As part of a WHS, every effort should be being made to improve this view, which currently is degraded by the Jewson's buildings in its foreground. Had a development brief been produced by the local planning authority for this site, that surely should have been a key principle of re-development. Inevitably, due to its scale and mass, the development would also impact negatively on the view across Carnsew Pool and the estuary arm from Lelant.

Reference has been made above to a current planning application submitted by Actoris Ltd for a retail foodstore, servicing and parking of the scale specified on Carnsew Quay [Cornwall Council ref. 10-0413-P]. Three of the computer generated images submitted to Cornwall Council as part of the application are attached to this report as Figures 7, 8 and 9, with added captions. In this instance, the application proposes that the main store should be located towards the edge of the quayside. Together these images demonstrate the very considerable scale, mass and footprint of the development. Carnsew Quay itself would lose its historic sense and character, becoming little more than a hardstanding for the supermarket development. Through its dominance in the landscape and its lack of local distinctiveness, the development would intrude significantly on views across the Harbour and estuary, and on the setting and appreciation of important heritage assets such as the Quays, a listed timber store on Carnsew Quay itself (see Section 3.3 below), Plantation, and the railway viaduct.

In 2009, an important planning appeal decision on a proposed development of a block of 11 apartments at 6 Carnsew Road [APP/L0825/A/08/2084420] found that the Quay is in a prominent position and that large scale development on the site would have a '*disproportionate visual impact*'. The Inspector concluded that this would '*not conserve the outstanding universal value...[nor] sufficiently protect the WHS*'. He also noted the importance of views from Plantation and the negative impact that such development would have upon these. Although the Inspector's findings were partly based upon PPG15 guidance, which has now been superseded by PPS5, it is not considered that this would have any material effect on his conclusions.

With a supermarket development of the kind envisaged, the outstanding universal value of the Port of Hayle as part of the larger WHS would be seriously damaged by further exacerbation of the lack of recognisability of Carnsew Quay, by comprehensive coverage of virtually the entire Quay with the new development involving loss of local distinctiveness, and by additional detrimental impact on key views. As with South Quay, it would also prevent greater coherence being brought to the historic environment along with strengthening of the Site's OUV, which were specific aims and intentions of seeking WHS inscription in the first place.

Summary of WHS issues and other matters

Having reviewed the general impact of the supermarket development on sites in Hayle Harbour and the potential for diminishment of the Port of Hayle's OUV by its impact on the specific sites of North Quay, South Quay and Carnsew Quay, the overwhelming conclusion must be that the Harbour is not a suitable location for such a development, given its WHS status and OUV. For a considerable number of substantive reasons, a development of this kind would be profoundly damaging to the outstanding universal value of the WHS and to the character and appreciation of the key physical attributes of the Harbour. Lying centrally within the Hayle WHS, this would be extremely unfortunate for its wider harmful effect.

The English Heritage/Department of Communities and Local Government/Department of Culture Media and Sport guidance note '*The Protection and Management of World Heritage Sites in England*' notes that '*The UNESCO World Heritage Committee has asked to be informed by national governments of proposals for major restorations or interventions which may affect the Outstanding Universal Value of a World Heritage Site*' and reflects that for administrative reasons, '*in some cases, it may be appropriate to refer cases before submission of an actual planning application*' [English Heritage (2009), para 7.12]. The decision on whether or not to refer cases to UNESCO is taken by DCMS on the advice provided by English Heritage. In passing it is worth noting that this only codifies an intent that lies largely unnoticed within UNESCO's 2005 Operational Guidelines, to which all member states are signatories, which requires approval for activities (implicitly, including development) even in the wider settings of WHSs to be approved by the World Heritage Committee [UNESCO OG; Para 107].

Almost by definition, area regeneration in Hayle Harbour has the potential to affect the outstanding universal value of the World Heritage Site. On that basis, each and every proposal for a development scheme of substance in the Harbour area should be referred to UNESCO's World Heritage Committee before the planning application is determined to allow them to '*assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved*', according to the EH/DCLG/DCMS guidance.

The alternative is clear from experience over recent years. As mentioned earlier, in part through ICOMOS, UNESCO monitors World Heritage Sites carefully for evidence of inappropriate development and takes such action as it deems necessary. If the proposals are not referred to the World Heritage Committee in advance and the scheme is instead given consent and built, UNESCO is likely to set in motion a process that will lead to considerable pressure being applied through the Government for the threat to the OUV to be addressed. In the past four years, pressure has been applied on the British Government regarding inappropriate development affecting the Tower of London, Liverpool and Bath World Heritage Sites. Internationally, there have been many other instances in the same timescale, including major developments in Vienna and Cologne. Big cities are not always involved. One currently active case, of which I have personal knowledge due to work this year on behalf of UNESCO, relates to development of a relatively small and low rise seating stand to an international cricket ground on the edge of the Galle Fort WHS in Sri Lanka, which was adjudged to have had a detrimental impact on views in towards the WHS. This has led to pressure on the National Government to enforce removal of the new stand (irrespective of the planning and legal difficulties this presents) and, in due course, to plan re-location of the cricket ground. Returning to Hayle Harbour, the lesson is that UNESCO *will* take action against the UK Government to enforce protection of this WHS, if it determines that inappropriate development has been permitted that places the Site's OUV under threat. In my opinion, based on equivalent experience internationally, UNESCO and its advisor, ICOMOS, would find a supermarket development of the size envisaged on one of the three sites in Hayle Harbour to be inappropriate development that puts the Site's OUV at risk of compromise and damage.

If this chain of events occurs, it could lead eventually to the WHS being placed on the 'In Danger' List and eventually to its permanent removal from the List of World Heritage Sites. This would be a source of acute embarrassment for the British Government and Cornwall Council, and would attract significant adverse publicity.

3.2 Scheduled Ancient and Other Monuments and Archaeological Potential

Background to analysis

There is one scheduled ancient monument [SAM] in the environs of Hayle Harbour, the Cunaide Stone, which is now embedded in a bank in the park created on the hillfort overlooking Carnsew Quay. The hillfort itself is not scheduled, although given considerable inconsistencies in what has been included and excluded from scheduling, this is not especially meaningful.

Similarly, the very significant archaeological potential of South Quay and Carnsew Quay arising from demolition of previous buildings of importance (see CISI/CAU Figure 16d and Inventory) has not been recognised by 'blanket' or selective scheduling of below ground level deposits on these structures. It is critical to recognise that only approximately 20% of monuments of national importance are actually designated as scheduled ancient monuments. The recent policy statement, PPS5, issued by central Government makes clear in Policy HE9.6 that unscheduled monuments which are of national importance should be treated in planning terms as if they were in fact designated. Given that historic Hayle Harbour has been acknowledged to be of international

importance as a central element within the Port of Hayle WHS component, it would be difficult to deny that the concealed/buried archaeological remains of the historic Harbour are of national significance as well. As the Practice Guide issued by English Heritage makes clear, in such circumstances, this means they will be subject in particular to the policies in HE9.1 to HE9.4 and HE10 (HE9.6) of the PPS. This is discussed in more detail below.

Impact assessment

Given the nature of the Cunaide Stone, the one SAM in the environs of Hayle Harbour, it is difficult to make arguments for a supermarket development in the Harbour area having any impact (positive or deleterious) upon it.

Although not scheduled, arguably the setting of the Iron Age hillfort, as a significant asset within Hayle's historic environment on the edge of the Harbour, should be of some real concern. The mound is triply significant as a heritage asset for it was a pre-historic hillfort/settlement built to protect the estuary, it was remodelled as a landscaped park by Henry Harvey in the 1840s, and - renamed Plantation – it provides about the finest panoramic viewpoint from which to experience and appreciate the Port of Hayle WHS. The damaging impact of development at Carnsew Quay on its setting and value has already been reviewed and need not be re-considered here.

As has been noted in the introduction to this subsection, the archaeological potential of all three Quays, but especially South and Carnsew Quay, must not be overlooked. In commenting on this potential, the CISI/CAU historical assessment stressed, *'The shipyard at Carnsew is of particular importance, not only for the buildings, but also for the slips and docks, all of which are buried under subsequent tipped material, a lot of it contaminated'* [CISI/CAU, pg 41]. The archaeological deposits that lie under the surface of the quaysides may provide invaluable insight into their make up, use and history. A supermarket development on any of these Quays will lead to permanent damage to this significant resource. In the past, whilst the Government's PPG15 and 16 were in force, this in itself did not necessarily provide sufficient reason to refuse applications for development, so long as full provision was made for investigation, protection and/or excavation of the buried remains, and associated recording and publication, as appropriate. However, this is one of the notable changes in emphasis within the new PPS5, which - as the English Heritage Practice Guide makes clear – now takes the view that,

'Although we may learn a lot from an investigation undertaken today, the knowledge is not a substitute for the heritage asset itself. Records cannot deliver the sensory experience and understanding of context provided by the original heritage asset...The ability to investigate and record a heritage asset is therefore not a factor in deciding whether consent for its destruction should be given (policy HE12.1)'. [EH PPS5 Practice Guide; paragraph 127, pg 36]

It is important to note that, for the reasons cited already, many if not all of the un-scheduled assets referred to above will be covered by the newly adopted PPS5 Policy HE9.6, which deals with the *'many heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance'*. Where this is the case, PPS5 stresses that *'the absence of designation for such heritage assets does not indicate lower significance'* and requires that they should be considered in the same way as a scheduled ancient monument. Policy HE9.1 of the PPS makes clear that substantial harm to the significance of a scheduled ancient monument should be a *'wholly exceptional'* occurrence. Since the archaeological remains below South Quay, including deposits associated with the important lost Harvey's shipyard, must surely fall into this category, there is a case to be made that a supermarket development built over the Quay would have the potential to cause them substantial harm. In such circumstances, the expectation on the local planning authority arising from PPS5 is that it will amongst other things *'consider*

proposed uses that are benign to the conservation of the asset's significance' [EH PPS5 Practice Guide; paragraph 99, pg 31]. The conclusion of this impact assessment is that, on the contrary, a supermarket development would jeopardise conservation of the archaeological significance of North, South and Carnsew Quays.

3.3 Listed Buildings

Background to analysis

The protection of listed buildings within their setting is a material planning consideration. Policy HE9.1 of PPS5 highlights that, as designated assets, there should be a presumption in favour of their conservation. For Grade II listed buildings – which is the grading given to all listed structures affected by development on North, South and Carnsew Quays – it deems that substantial harm resulting from consented development should be an 'exceptional' occurrence.

Policy HE10 of the newly adopted PPS5 states that,

'When considering applications for development that affect the setting of a heritage asset, local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. When considering applications that do not do this, local planning authorities should weigh any such harm against the wider benefits of the application. The greater the negative impact on the significance of the heritage asset, the greater the benefits that will be needed to justify approval.'

It also requires that local planning authorities identify opportunities for changes in the setting to enhance or better reveal the significance of a heritage asset, including listed buildings.

Existing listed buildings/structures will potentially be affected – to some degree or another – by a supermarket development on each of the three sites within Hayle Harbour. Before looking at the individual impacts, however, there is an important point to be made that has been recognised previously in the two detailed assessments made of Hayle's historic environment since 2000 (that is, the CISI/CAU and CSUS studies). The coverage of listing in Hayle Harbour and on these three sites in particular is extremely inconsistent. This is at least partly as a result of industrial heritage having been undervalued until very recent years, leading to patchily applied statutory protection of such assets. As the CISI/CAU study noted,

'Coverage [of the remains of the industrial complexes] is inconsistent and structures have rarely been considered as part of integrated complexes or in terms of a themed approach. Thus, while Merchant Curnow's Quay, Carnsew Quay, Copperhouse Dock, South Quay and East Quay are listed, North Quay and Tremearne's Quay are not, despite being as early or earlier than the others (between 1740 and 1811) and as well constructed and prominent. Although important mid 19th century structures on the wharves have been listed, surviving 18th and early 19th century structures have not been recognised for what they are, and none is listed. There are also later structures of quality and interest on the wharves which have no statutory protection'. [CISI/CAU, pg 79]

This is important. When assessing impact upon listed structures, it is critical to recognise that at Hayle Harbour, this is a particularly skewed process and there are a number of equally important elements (such as North Quay) that should be listed and hence be part of the assessment, yet are not.

Impact assessment

North Quay

As we have seen, North Quay itself is not listed. There is a single listed building on North Quay, a Grade II listed structure at its eastern end, which is said probably to have been a pair of stables or loose boxes built in 1888 for the Britannia Inn that stood nearby. This small single storey building is ruinous and in poor condition. Impact of supermarket development will depend upon scheme design, but it is safe to say that the listed building is very fragile and its setting critical. Appreciation of its historic context and vital link to transport for the mining and port industries will be lost if it changes from being a dockside building to little more than a curiosity within a 225-space supermarket car park. It seems highly likely that large scale development on North Quay will overwhelm the significance of this listed building, whether through proximity to the bulk of the supermarket itself or the need to upgrade the access road and provide service facilities. The listed building may well be placed at risk by such a development, despite the presumption in favour of conservation dictated by PPS5, because of its central location near the 'throat' of the Quay. Loss of this building would diminish the historic interest and significance of the Quay and, by erasing evidence of transport associated with mining and dock activities, weaken the OUV of the WHS.

South Quay

South Quay is a Grade II listed building; there are no other listed structures on the Quay. The quay walls date to about 1819 and are constructed of squared granite and killas rubble, granite ashlar, copper slag blocks and granite dressings. They are scalloped on plan. Parts of the walls are in poor condition, with localised collapse.

The impact of a supermarket development on the quay sides has been discussed already and need not be commented on further here. As a listed structure, it is inevitable that South Quay would be dwarfed by a supermarket development that takes up three-quarters of its length and its full width and that over-sails the quay walls several fold, depending upon tide.

Carnsew Quay

Carnsew Quay is a Grade II listed structure. It was built in 1758 and extended in 1834. The quay walls are constructed from granite and elvan rubble, with granite dressings. Seated on the landward edge of the quay is a separate L-shaped Grade II listed building, a 19th century timber store built by Harvey's. This is the sole survivor of the range of utilitarian quayside buildings that covered the southern edge of Carnsew Quay by the end of the 19th century. It has been described as *'a very rare example of a structure of this type associated with the shipbuilding industry of the 19th century. While it is a simple building, the timber store is a key element in the town's development'*.

The 2009 planning appeal decision on 6 Carnsew Road, to which reference has already been made, related to the impact of development on this structure and its setting. In that case, a 9.5-11.0 metre high block of apartments was planned within the setting of the listed timber store (which has an eaves height of roughly 4.5 metres). The overall footprint and mass of the apartment block would have been less than that of the envisaged supermarket development. In dismissing the appeal, the Planning Inspector found that the building would have had *'a disproportionate visual impact in this prominent location and that it would dominate the setting of the listed timber store, thereby compromising the quality of the local environment'*. Importantly, he also determined that the whole of Carnsew Quay *'is closely associated with the listed timber store and in my view is an essential part of its character'*. Overall, the Inspector's conclusions support the notion that any large

scale building on the Quay, with a design that does not *'respect traditional local patterns of development and would not be integrated with its surroundings'* would be unacceptably damaging to the conservation of the listed building. Figure 9 at the rear of this report shows just part of the very considerable impact that the Morrison's supermarket development proposal recently submitted by Actoris Ltd [Cornwall Council ref. 10-0413-P] would have on the listed timber store and its crucial quayside setting when viewed across the estuary from Lelant. From that direction, the listed building would become subsumed into the bulk of the supermarket structure, dramatically altering the perception of its character. Indeed, the image ably demonstrates that, from any direction, it is inevitable that a development of this nature and scale will dominate the setting of this very important heritage asset, destroying any sense of place and its intimate connection to a historic quayside.

Once again, both the general impact of a supermarket development of the specified scale and the specific impact that would result from the proposed Morrison's development [Cornwall Council ref. 10-0413-P and Figures 7, 8 and 9 of this report] on the listed Carnsew Quay have been discussed already. The entire area of the Quay would be utilised for the development, impacting substantially on its character, its integrity and its significance. That would seem to be at odds with the demands of Policy HE9.1 of PPS5. It is difficult to comprehend how the public benefits of a stand-alone supermarket development on Carnsew Quay could be considered to be so substantial as to outweigh the conservation interests of the listed structure.

3.4 Conservation Area

Background to analysis

Designated conservation areas are protected under the Planning (Conservation Areas and Listed Buildings) Act 1990, with guidance on related development issues again being provided by PPS5, an associated English Heritage Practice Note, and its conservation area specific guidance notes.

The entire Harbour lies within the large Hayle Conservation Area, which has been extended in the last decade. Unfortunately, there is at present no up-to-date conservation area appraisal and management plan to guide development within the Area, although one is planned by the local planning authority. However, the character of the Area is covered (non-specifically) within the CISI/CAU and CSUS studies, which also discuss certain Conservation Area related issues.

Impact assessment

Conservation areas are designated as areas of special architectural or historic interest. Their principal focus is the care and nurturing of their special character. In respect to the Hayle CA, the character of the Harbour area is defined by its openness and historic built forms - and that of the urban 'arena' surrounding it (Penpol and Foundry) - its open spaces, local distinctiveness (especially derived from materials usage) and the many and varied key views, including those along creeks, across the Area, of the Penpol settlement, from Plantation etc. This is a complex, interwoven character matrix. It must be accepted that, to a degree, the current extent of openness of the Quay sides is an abnormal situation created during the 20th century by demolitions, but in reality, as we have seen, the built grain was always largely open with its form being low rise and mostly small scale.

The impact of a supermarket development on North, South and Carnsew Quays has been discussed in detail already. The extent of hardstanding, visible infrastructure for access and servicing, and the bulk of the supermarket structure mean that the impact on the character of the Harbour character area of the Conservation Area would in each case be dramatic and negatively transforming. Its mass and probable

adoption of modern 'anywhere' design and materials would lead to significant diminution of local distinctiveness and, as has already been seen, there would be a fundamental effect upon the key views in every direction, including from the Plantation viewpoint. It is worth highlighting in respect of Carnsew Quay that in the previously mentioned 2009 planning appeal decision on 6 Carnsew Road, the Inspector found that a proposed development of less bulk and smaller footprint than a supermarket of the specified form on the Quay *'would not...preserve the character or appearance of the conservation area'* and was unacceptable.

A supermarket development of the kind envisaged in the Harbour arena would have a serious negative impact on this part of the designated Hayle Conservation Area, damaging its character, local distinctiveness and key views in to, out from, along and across the Quays.

4 SUMMARY

This report has found that a supermarket development of the specified scale located within Hayle Harbour at North, South or Carnsew Quays would have an undesirable and major deleterious impact upon the historic environment and upon the Harbour's significant heritage assets. The outstanding universal value of the Port of Hayle WHS would be seriously impaired, listed structures and their settings would be compromised (possibly including the threat of demolition), and the character and appearance of the Hayle Conservation Area would be negatively impacted. Furthermore, key views would be permanently degraded and potentially important, but currently undesignated, heritage assets would be put at risk.

These potential impacts are of such magnitude that it must be concluded that a development of this scale (whatever its intended use and claimed benefits) would be wholly inappropriate within the Harbour area. Whilst it is accepted that Hayle Harbour urgently needs regeneration, it is vital for the survival of Hayle's important historic environment that such regeneration is heritage-based and respects local traditions and distinctiveness. A supermarket development is simply not compatible with these criteria. Hayle Harbour is an unsuitable location for development of this sort on heritage grounds.

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Heritage Places

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4th June 2010



Figure 1: View to South Quay from North Quay



Figure 2: View of North Quay along East Quay



Figure 3: South Quay and Penpol Creek from south



Figure 4: General view from Plantation



Figure 5: North Quay from Plantation



Figure 6: South Quay from Plantation



Proposed View to Site from Penpol Terrace

- PLANNING -

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Project Title	Morrisons Hays
Drawing Title	CGI Perspective View 3
Drawing Number	SP2411 - P303
Scale	As Shown
Author	Planning
Check	
Date	10/20/2017

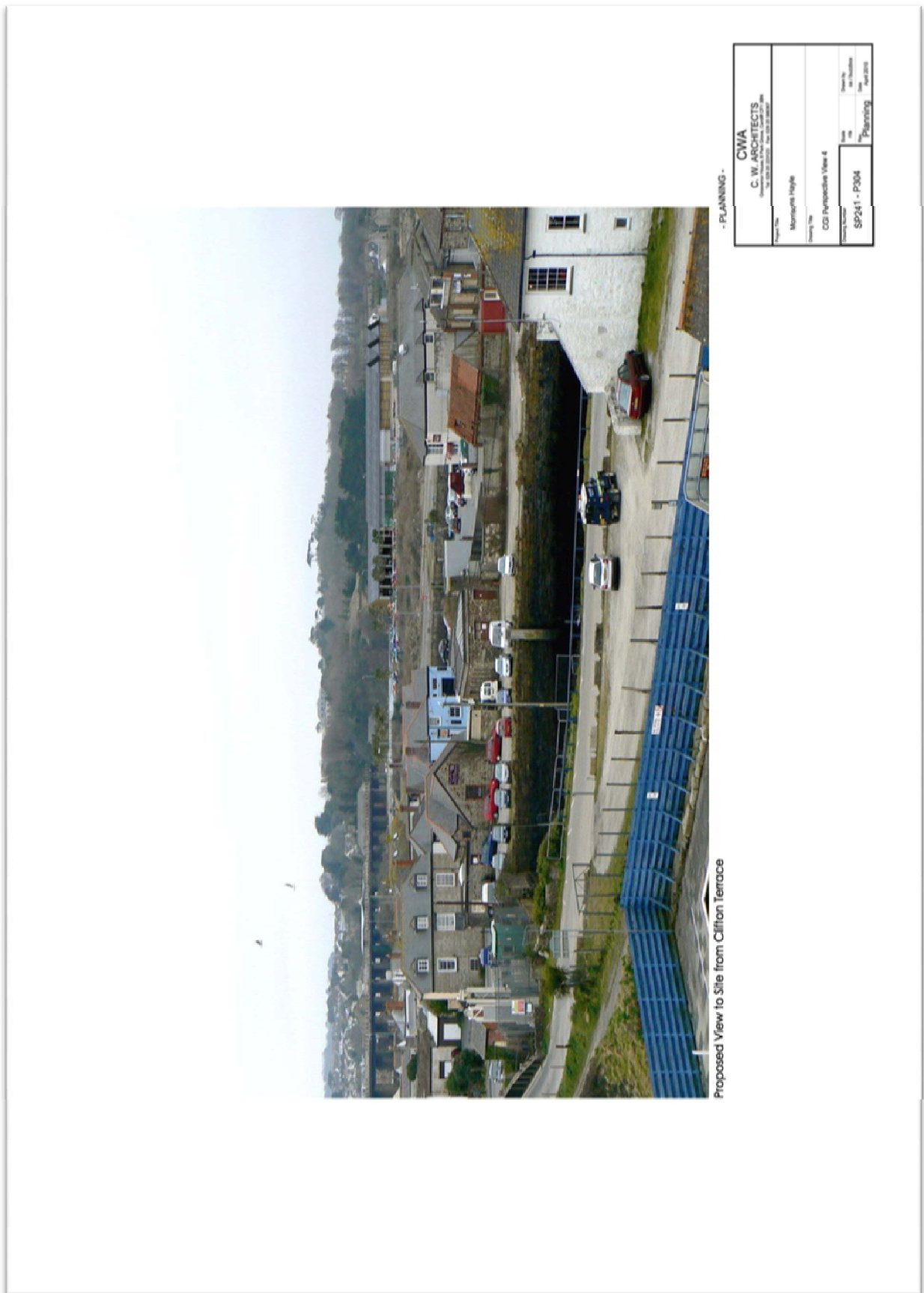


Figure 8: Planning submission CGI showing impact of proposed supermarket development by Morrisons at Carnsew Quay on view across the WHS and on appreciation of the viaduct – a key industrial archaeological component - from Clifton Terrace alongside North Quay



Proposed View to Site from St.Uny's Church

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Project No	001
Project Name	Morrisons Hays
Project No	001
Project Name	CGI Perspective View 5
Project No	001
Project Name	SP241 - P305
Project No	001
Project Name	Planning

Figure 9: Planning submission CGI showing impact of proposed supermarket development by Morrisons at Carnsew Quay on view across estuary and WHS and on setting of the listed timber store (seen to the right of the main store) from St Uny's Church, Lelant