

Mr Linturn Hopkins  
Department for Transport  
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Our ref:  
Your ref:

Telephone 0117 975 0676  
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21 November 2008

Dear Mr Hopkins

**Re.: Penzance Harbour Revision Order**

Whilst we understand that a similar Harbour Revision Order was granted previously (with the omission of the quay extension), it is regrettable that the opportunity has not been taken to reassess the proposals and produce an alternative scheme which is less harmful to the historic environment.

English Heritage acknowledge the stated desire to improve transport links between the mainland and the Isles of Scilly, and the resultant economic and social benefits this may bring, but would agree with the applicant's own Environmental Statement that:

"The stonework to the North Arm and South Pier is a distinctive part of the harbour and creates the setting for the entire area. The loss or concealment of part or all of the harbour walls as part of a scheme may be considered to have a large adverse effect on the heritage asset as a whole." (Chapter 13, p13 of 32)

Whilst acknowledging the many issues to be considered when assessing such a major proposal, it is regrettable that more weight was not given to the historic environment; with the South Pier being almost entirely obscured when viewed from along the coast to the south and from the seaward side. Traditionally constructed stonework harbours are a distinctive feature of coastal settlements in the south-west; the use of concrete blocks for the extensions and the extent of rock-armour is, therefore, regrettable. These elements seem to be driven by technical and engineering requirements, rather than a wider consideration of their visual impact and the resultant harm to the area's local distinctiveness. The use of natural, local materials for the extensions would greatly improve the proposals.

As part of any scheme of this nature, we would expect that any elements of the historic environment, demolished or obscured by the development, be adequately recorded and/or removed for off-site preservation, prior to any works commencing; this should include any elements within the inter-tidal zone and any submerged archaeological deposits. We would hope that the Cornwall County Council Historic Environment Service has already provided suitable conditions and advice on appropriate recording and analysis. We would also expect you to have taken appropriate specialist advice to ensure that any development does not cause damage to adjacent elements of the historic environment (such as the listed Jubilee Pool) through the effects of wave displacement, etc.

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Whilst one would expect to encounter robust industrial / engineering structures in such harbour-side location, the area is also a sensitive historic location and any proposals must be well designed and detailed. The success of any such major infrastructure improvement will also be dependent upon the quality and design of its smaller elements: the interface between historic and new fabric; the design of any quayside buildings; and other features, such as gates, railings, signage, etc. The design of the public realm and ground surfaces around any structures is also a key in the success of any scheme, and requires careful consideration.

I hope these comments are of help to you

Yours sincerely

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