

Friends of Penzance Harbour

www.friendsofpzharbour.org

Key Objections

As a result of the recently enacted Harbour Revision Order (HRO) Cornwall Council now consider that they have permitted development rights for most of the Option A scheme to build on Battery Rocks beach (see www.friendsofpzharbour.org/blog_more.php?b=49 for more information). However Cornwall Council still needs "listed building consent" and planning permission for the new sea wall. Applications for these have recently been submitted and the deadline for objecting is November 19th.

The request for "listed building consent" (ref 09-1119-LBC) is by far the more important of the two applications. The case against granting it is strong and without it the project cannot proceed, but to be effective letters of objection must address issues that are relevant to the consideration of "listed building consent". See below for issues that should form the basis of a successful objection.

The other application (ref 09-1118-P) relates to the construction of a new sea wall above the level of the reclaimed area and is probably the result of an error in the drafting of the HRO. Planners will consider this in isolation as if all of the rest of the scheme was already in place, and as such it will be much harder for them to refuse. That said, objecting to it is a good opportunity to repeat our objections to the whole scheme and a summary of these can be found below.

Both applications can be viewed at www.cornwall.gov.uk/default.aspx?page=21669. For more information about the importance of the listed South Pier view the application's Historic Building Analysis www.friendsofpzharbour.org/pdfs/HistoricBuildingAnalysis.pdf.

All or some of the following points should be included in your objection
but it will be most effective if it is written in your own words.

Key objections to planning application No. 09-1119-LBC Request for "Listed Building Consent"

1. The works will seriously harm what the applicant's own Historic Building Analysis describes as "among the most sensitive of any archaeological sites in any Cornish urban environment, and, in a national context, as significant an archaeological resource as any harbour or coastal town in the country".
2. The demolition works will cause very substantial damage to the fabric of the listed building and in particular the pier's 1745 parapet wall. English Heritage has said that "the stonework to the 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."
3. The works will irreversibly bury (through infill and rock armouring) large parts - including the oldest parts - of the largest, longest 18th century pier in Cornwall, fundamentally changing its character from a free-standing and iconic part of the town's

historic landscape into little more than an underground and inaccessible archaeological relic. The applicant's own historic building analysis describes it as "part of an extensive and important harbour complex that puts it on a par with [Grade] II* [listed] harbour structures elsewhere in Devon and Cornwall", and goes on to say that the current Grade II assessment is inaccurate and the pier should be Grade II* or "scheduled" which would make it part of the most important 8% of listed buildings in the whole country.

4. The works will fundamentally harm the character of the listed building by removing from view the elvan Portzoden reef on which the pier was built and which provided the original shelter from storms that led to the settlement that became Penzance; by removing the reef from view a key narrative linking the pier to its locality and to the history of the settlement of Penzance is lost.
5. The works will fundamentally alter the public's visual experience of the listed building and in particular the part it plays in views of Penzance from the sea, where the pier's part in the history of Penzance is at its clearest and the visible impact of the works is at their greatest.
6. The works involve the addition of a new pier head light, and the switching off of the historic 1853 lighthouse will eliminate the utility and seriously harm the character of a key element of the listed building. The light's new position relative to the pier head (some 20m away) will also seriously undermine the integrity and continuity of the listed building.
7. The abutment and tying-in of a massive modern concrete structure (and rock armour) to an historic building built to different tolerances will inevitably have serious negative impacts on the listed building's fabric and future stability.
8. By drawing heavy goods traffic further into the harbour area (at present they set down at the North Arm) the works will have an adverse impact on the setting and fabric of the listed building.
9. The materials and methods envisaged in the works are entirely out of keeping with the appearance and design of the listed building; the use of "tinted concrete" instead of local granite is clearly inappropriate.
10. The nature of the works and the impact on the listed building is such that meaningful mitigation is not possible; the applicants own planning and heritage statement accepts as much when it describes mitigation in terms of "building recording".

Cornwall Council will almost certainly claim that the damage to the listed building is acceptable because the scheme carries "substantial benefits for the community", so it is important that in addition to items 1-10 (above) you also include the points made in items eleven and twelve (below):

11. The works will not enhance the environment (quite the contrary) and the placing of an industrial development and associated heavy goods vehicles in a leisure area of high historic and amenity values will hinder, not help, the economic regeneration of the area.
12. Because there are alternative plans that meet the same objectives without causing harm to the listed building also means that the works carry no special wider "substantial benefits for the community" of Penzance or the Isles of Scilly.

Objecting to planning application No. 09-1118-P “Construction of a New Sea Wall”

This planning application relates to one part of a scheme, the whole of which was rejected by the public the last time a planning application for it was made. The following objections for the whole scheme consequently apply equally to this application for the construction of a new sea wall:

1. The development is in conflict with a number of policies and objectives contained in the Local Plan and County Structure Plan.
2. The development will damage the listed South Pier and have a serious adverse effect on the setting and character of the historic harbour and of Penzance as a whole.
3. The development will obliterate Battery Rocks beach and seriously harm the landscape, amenity and natural values of the area.
4. The development ignores traffic congestion problems in the harbour area and does nothing to reduce the adverse effects of this on health, the natural and built environment and public safety.
5. The development's form, bulk and general design are not in keeping with the character of its surroundings.
6. By damaging the natural environment and undermining the town's most important heritage assets, the development harms features that are essential to the long-term wellbeing of the tourism industry and local economy.
7. Alternatives, and in particular the out-of-town freight depot proposal, would meet all the developer's objectives, make efficient use of existing sites and buildings, and remove over 250 cars, vans and lorries from the congested harbour area for each freight sailing.

End.