

True Friends of Penzance & Isles of Scilly

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Dear Sir,

Isles of Scilly Ferry Link Project/Penzance Harbour – Planning Issues.

1. Whilst we appreciate the strenuous efforts made by both Councils to advance the IOS Ferry Link project we feel it necessary to restate our case in the strongest terms because;

- a) Central Government is under great pressure to make deep cuts in infrastructure spending and only vital projects can expect to go ahead.
- b) The relocation of the helicopter service to the Isles of Scilly and some uncertainty about its long term future make a new all-year-around passenger ferry service even more important.
- c) Objectors have raised the stakes with a petition to the EU Parliament and the lobbying of Government Ministers.
- d) English Heritage appears blind to the consequences of adopting, uncritically, the agenda of The Friends of Penzance Harbour. The recent decision by English Heritage to list the Penzance War Memorial/Battery site (LBS No. 507859 dated 24 Jun 10) with its cross-referencing to Friends of Penzance Harbour website documents undermines any claim to objectivity and impartiality.
- e) There is very strong support for the project and resentment that objectors claimed (and still claim) to represent the overwhelming majority of the community. We discovered this when canvassing over 3700 local residents in Penzance Wharfside Shopping Centre over a 6 week period from 16 Jan 10. In addition to over 3000 signatures in favour of the project there were over 800 letters of support to the Planning Department, the vast majority from local residents. These residents expect to be listened to.

2. The True Friends of Penzance & Isles of Scilly is an umbrella organization representing organizations and individuals supporting Cornwall Council's plan to upgrade Penzance Harbour. It was set up in January 2010 following a disastrous Council planning decision in Dec 09 to refuse Listed Building Consent for its own project in the face of extremely hostile (and expertly executed) lobbying.

Support for Option A

3. Since January 2010 we have managed to prove that whilst the project remains controversial there is extensive support for the planned works on Penzance Harbour (plan termed Option A).

- The Penzance Chamber of Commerce supports Option A with a very large majority in favour

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- Penzance and District Tourism Association supports the project with over 90% of members in support.
- Over 3000 local residents in Penzance signed a petition in favour of Option A. Some 2500 of these signatures were presented to Cornwall Council prior to 8 Mar 10.
- 120 local businesses publically declared themselves in support in the Facebook campaign (entitled "A Future for Penzance"). The campaign attracted 3700 supporters.
- Over 800 people wrote to Cornwall Council Planning Department supporting Listed Building Consent. This level of support is unprecedented in planning circles.
- Cornwall Council Strategic Planning Committee, recognizing the high level of support for this controversial project and its responsibility to weigh off heritage considerations verses economic and community needs, voted 14 to 7 in favour of granting Listed Building Consent and 14 to 2 in favour of granting planning permission.
- The Harbour was a significant issue in the St Ives constituency at the General Election. The standing MP sided with objectors in Dec 09 and had his majority slashed from 11,609 to 1,719 by his Conservative challenger who (alone) unambiguously supported the project plans.

Why we believe this project must proceed.

4. Limited life of Vessels. The two existing vessels (ferry and freight) are 33 and 29 years old respectively. An extension of licensing by the Maritime Coastguard Agency (MCA) is likely to be problematic. We understand that there are already significant restrictions imposed upon the operation of the ferry by the current licence. The ferry is due its next 5 yearly certification in February 2012. If remedial work is required as a condition for the issue of a new licence, will the remedial work be economically viable? The ferry's last major refit was in 1998 and cost £1.7 million. We do not know the answer to this question but it is a critical consideration.

5. Uncertainty over Future Helicopter Service. British International Helicopters has announced that the helicopter service to the Isles of Scilly from Penzance is due to move to a location on the North Coast in Nov 2011 and indicated some uncertainty over the long term future of the service. Both St Just and Newquay are prone to fog at certain times of year resulting in suspension of services. The helicopter relocation from Penzance makes a reliable ferry operating all year around even more important.

6. Exhaustion of Options at Penzance. Realistically, Option A appears to be the last chance for Penzance. The current plan is the last of about 14 options explored since 2003 and one of the least ambitious as far as reclamation is concerned (Option C with its proposed out of town freight area is excluded as it was never an economically viable solution). There is negligible prospect of finding a viable, alternative solution that does not affect listed buildings and does not attract objections. Option A is a low risk and eminently deliverable solution that also solves a pressing sea defence problem for Penzance.

7. Financial Risks incurred by Delay or Cancellation. Bumping the project into the future carries the following risks:

- a) The £11 million EU Convergence Fund contribution will almost certainly be lost because the funds must be committed by Dec 2013 and spent by Jun 2015.

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- b) With the uncertainty of the service life of the ferry and freight vessels and both harbours non-compliant with current safety and security regulations, there is no possibility of just cancelling the project indefinitely – the project in some form will have to be funded eventually. If EU funds are not available then the cost of the Harbour works to the UK tax payer will increase by over 46% (from £24 million to £35 million)
 - c) The Government might be forced into an expensive temporary solution if the ferry link project is delayed or cancelled and then an accident/incident occurs which results in the ferry not being able to operate. The cost of any temporary workaround would come on top of the final project cost, inflated by loss of the EU convergence funding.
8. Implications of a move to Falmouth (Default Option). If no solution is found in Penzance then the ferry link would, by default, eventually end up in Falmouth, a town eager to accept the ferry. Such an outcome would have a devastating impact on the Isles of Scilly economy and Penzance and West Cornwall in general. This is because:
- a) The ferry day-tripper business for the IOS would be limited by the significantly longer journey time from Falmouth.
 - b) Already sky-high freight costs for the IOS would probably rise even further.
 - c) Penzance would lose 190 jobs either directly or indirectly linked to Isles of Scilly ferry links taking £2.2 million out of the local economy (Hansard 5 Jan 2010 : Column 34WH) .
 - d) Penzance would lose retail and business to business trade. Any transaction involving large items (e.g. buying a carpet) would move with the ferry. Retail activity would be substantially depressed.
 - e) Penzance would lose a substantial amount of tourism business because it is a transit point for approximately 44,000 return ferry trips a year. IOS visitors represent between 15% and 25% of the bed nights in local guest houses.
 - f) Penzance harbour would lose over 30% its income with the loss of the ferry and freight vessel. The sustainability of Penzance Harbour as a working harbour would then be in question and also the resources for the upkeep of the listed Harbour structures. Penzance does not want its harbour to eventually emulate Mullion Harbour (Grade 2 listed) which the National Trust are allowing the sea to reclaim under a policy of 'managed retreat' because it is too expensive to repair.
 - g) West Cornwall would lose tourism income because many visitors to the Isles of Scilly spend some time visiting tourist attractions in Penwith.

Why Strong Local Support Exists

9. There are good reasons why the scheme has widespread support in Penzance::
- a) Penzance Harbour is in a state of decay and has been for years. There is insufficient revenue to maintain its historic structures let alone invest in essential facilities required to keep the ferry service operating from Penzance in the long term. Townsfolk know that the Harbour needs a large grant from Central Government to upgrade it, extend its life and to ensure the long term future of the ferry link.
 - b) The majority of local residents want the Harbour to remain a working harbour providing jobs and trade for the Town. They are concerned about incomers, especially those retiring into the area, dictating its future as a primarily recreational

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/leisure facility. Such a development goes against the ethos of the Town and also only offers minimum wage seasonal jobs to local people.

- c) The proposed design solves a pressing sea defence problem for the Barbican by building a new section of sea wall approximately 32 metres out from the existing sea wall. Alternative solutions proposed by objectors ignore this pressing problem which has safety implications for future use of South Pier.
- d) After 7+ years of debate and examination of 14 alternatives (and various sub-options), the majority of townsfolk and businesses believe it is time to accept that the best compromise has been reached given the constraints of Penzance Harbour. 'It is considered unlikely that a better, credible, solution can be found which will not continue to attract vociferous opposition. Alternatives identified by objectors do not have universal support amongst all objectors.
- e) The proposed design hides the freight facilities away in the reclaimed area and behind sympathetic new passenger terminal which almost all residents see as uncontroversial. The loss of Battery Rocks Beach, a rather grim area of shale foreshore behind the South Pier harbour wall, is not an issue for the majority of Penzance residents (we have miles of beautiful beaches). Many do not understand what all of the fuss is about.
- f) The majority of local residents in Penzance, who had no particular issue with the Council's plans, just wanted the Council to get on with it. When the plans were rejected by the Planning Committee in Dec 09 many residents felt the issue had been hijacked by a well organized lobby group who unjustifiably claimed to represent them

Rebuttal of Objectors Assertions.

10. A rebuttal of assertions made by Friends of Harbour is attached. The rebuttal is of the petition to the European Parliament delivered by the spokesperson for FofPH on 15 July 2010.

Listed Building Consent.

11. The listed building consent for South Pier comprises two relatively modest changes – gaps in the top of the South Pier harbour wall to allow vehicles to drive into the compound created by the new harbour wall. Although these changes are modest, and in our opinion easily justified, the issue for English Heritage is the reclamation of Battery Rocks Beach. English Heritage have been convinced by objectors that reclamation is not necessary because other alternatives exist. The reality is that there are no unexplored viable options. The project has metaphorically been 'beaten to death'. If the unsupported assertions of objectors are ignored then there is a compelling case for granting listed building consent - the conclusion Cornwall Council Strategic Planning Committee eventually came to voting 14 to 7 in favour on 8 Mar 2010. We believe listed building consent is justified for the reasons given below.

12. Sea Defence Problem must be Addressed. There is a fundamental problem with sea defence along the length of South Pier and in front of Barbican. Rock armour is proposed for outer 2/3 of South Pier and is reluctantly accepted as necessary by English Heritage. The innermost 1/3 would be protected by the new sea wall and the sliver of land between old and new sea walls reclaimed for the terminal. If the land (Battery Rocks Beach) was not reclaimed then it would have to be largely covered in rock armour as the listed wall cannot simply be knocked down and replaced by a new, more effective wall. The rock armour covers up more of the old harbour wall than the reclamation (rock

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armour comes much higher up the harbour wall than the floor level of the reclaimed area). The issue then is not so much protection of heritage but aesthetics.

13. Reclamation solves a Congestion Problem. There is a shortage of space in Penzance Harbour which is why all options involve new land from either reclamation, removal of existing commercial buildings or an out of town site. By reclaiming an area with a sea defence problem, an area that would otherwise be covered in rock armour in the future is reclaimed with the building of a new sea wall. As the new sea wall is to be faced in granite matched to existing stonework there is no reason why, after some weathering, the new wall should not blend in to the harbour. It is accepted that the new wall is higher and more imposing but that is a reflection of the problem to be solved – increasing frequency of very high and damaging waves. A further advantage of the proposed new freight area is that vehicles no longer have to routinely reverse up and down North Pier causing huge traffic jams along Wharf Road.

14. Reclamation de-clutters the Historic Harbour. The reclaimed area is masked from the view of the public behind old and new sea walls. It will contain the freight and related facilities currently strewn around North Pier. The de-cluttering of North Pier will open up the Inner Harbour to the public and allow the fine Victorian construction to be appreciated. The recent AECOM public consultation map showing regeneration ideas in the Penzance Harbour and Barbican illustrates just how neatly the new facilities dovetail with ideas about regeneration and opening up the harbour to the public (see attached map, Item 3 (new terminal facilities) item 9 (Barbican)).

15. Lack of Viable Alternatives. Over 7 years some 14 options and numerous sub-options have been reduced to just one – the least intrusive and least costly of all the options considered which were economically viable. Objectors supported two alternatives for Penzance, Option C with an out of town freight centre and Option Pz, a conceptual solution promoted by the local MP. Objectors also supported a Fast Ferry concept promoted by Mr Cartwright for which no detailed harbour plans exist.

- a) Option C. Freight throughput of the Harbour equates to ~40 tons a day, a small amount in commercial terms delivered by less than 100 vehicles/day dropping of loads (total road traffic movements 13,000 a day). This level of activity in the harbour has been going on for generations. The proposed solution would mean deliveries would be received at an out of town centre and sorted. Sorted freight would then be brought down to the harbour at loading time. The flaws in the option are the added cost of the new out of town facility and the fact that many deliveries like roof trusses, building materials, oil, compressed gases and animals would have to bypass the by-pass the out-of-town freight centre in any case and be delivered direct to the quayside. The cost of the new facilities was estimated by the Council at around £150,000 a year but one of the bidders stated quoted over £300,000 a year. This additional cost has to be added to already high freight charges or absorbed by the ferry operator who would then pay less to the Council for the franchise (meaning the vessel loan is paid off more slowly). On this basis Option C was determined not to be an economically sustainable solution. We would also argue that Option C is not necessary if you accept that working harbours have freight in them as a matter of course and we are talking about small quantities.
- b) Option Pz. Option Pz proposed building a combined freight and passenger terminal on the harbour front where the existing Waterside Meadery Restaurant and Penwith Marine Engineering businesses are currently located. The much reviled “Industrial Freight Facility” was placed in the area right in front of the Dolphin Inn, an area that Town Planner wanted to open to the public. The solution restricted public access to South Pier. It also required HGV vehicles to manoeuvre on a dangerous bend in the harbour road. The Council had previously

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considered demolishing the Waterside Meadery Restaurant and this had provoked a petition against the plan with over 2000 names on it. Even if Option Pz passed the regulatory hurdles (especially Highways Agency) public opinion would prevent it going ahead. Option Pz left the sea defence solution 'undefined'.

- c) Fast Ferry. A retired ex-manager of the IOS Steamship Company has proposed a solution based upon an existing fast (27 knots) twin hulled ferry. The vessel does not operate in the UK (needs to be licensed), has a deeper draft and cannot sit on the sea bed like the current or future combined freight and passenger ferry. Both harbours would require dredging to such a depth to accommodate the SWATH vessel that it is likely the foundations of the quays could be undermined requiring expensive civil engineering works. Because the proposed fast ferry carries fewer passengers than the current or future combined vessel (365 verses 600) it has to complete 2 round trips a day to move peak visitor numbers. It has substantially higher operating costs (mainly fuel costs) and requires a separate freight vessel for cargo. The combination of fast ferry and freight vessel give the highest operating cost of any of the vessel solutions considered. The fast ferry would not operate in the winter, a requirement the Islander's insist upon because fog and bad weather can prevent people leaving the islands for a week at a time when the only passenger option is travel by air. There is also concern that heavy seas (wave height) would limit operations because, for this relatively small SWATH vessel, the bridge between the two hulls is closer to the sea resulting in 'slamming' when waves hit the underside of the bridge. The fast ferry vessel envisaged (CloudX SWATH vessel) was ordered in 1992, delivered in 2002 and operated for 6 months on a route between Florida (West Palm Beach) and the Bahamas. It was withdrawn from service for commercial reasons and put up for sale where it has remained for many years. The fast ferry proposal lacks financial and operational credibility.

Conclusion

16. In considering the Penzance Harbour element of the IOS Ferry Link project and whether to grant Listed Building Consent, the issue comes down to priorities and how they affect vital interests. Which is more important? A strategic project to replace an aging lifeline to the Isles of Scilly which supports the livelihoods of thousands of people in one of the UK's poorest areas or keeping an historic harbour (with a 500 yr history of constant adaptation) as an inviolable historic monument. If the decision is not obvious then consideration should be given to the fact that Cornwall is losing its historic harbours because when they cease to be working harbours the need and the resources to repair them dry up. Mullion Harbour, an archetypal Grade 2 listed Cornish harbour on the Lizard Peninsula, is managed by the National Trust. There is probably no more respected guardian of heritage assets in the country, but the National Trust has been forced to adopt a policy of 'managed retreat' which means gradual abandonment to sea, because of the prohibitive maintenance costs. Cornwall's harbours are a disappearing species as Cornwall Council can attest to. Nobody is claiming that this fate awaits Penzance Harbour immediately but the loss of the ferry would put a question mark over the long term viability of Penzance Harbour as a working harbour and create a problem in maintaining it to the standards appropriate for a Grade 2* listed structure.

17. When considering the decision to grant funding the Department of Transport needs to recognize that the IOS Ferry Link is in a class of its own. It is a truly vital lifeline to a remote community. All elements of it are a serious risk to its continued operation, the vessels because of their age and the harbours because of their lack of facilities and regulatory non-compliance. With over £11 million of EU convergence funding available but due to expire if not committed by 2013, there is a high risk that delaying this project could backfire. A failure of the ferry service would be very public and the solution

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expensive given that EU funding for approximately 32% of the harbour costs would have been lost.

18. At a time of stringent Government cuts, funding the ferry project demonstrates, in an easily communicated way, that truly vital projects are being funded when they arise but in doing so no dangerous precedent is set because the IOS Ferry Link is unique.

Recommendation.

19. That Cornwall Council forward our letter to the appropriate Government ministers responsible for Listed Building Consent and funding of the project, perhaps as an enclosure to their own representations for this vital project.

Yours faithfully,

DICK CLIFFE
For True Friends of Penzance
And Isles of Scilly

MICHAEL ADAMS
For Future Penzance

MIKE WATER
Chairman
Penzance Chamber of Commerce

ANDY CURTIS
Chairman
Penzance & District Tourism Association

Copy to: Chair, Council of the Isles of Scilly

Enclosure:

Penzance Harbour & Barbican (AECOM map showing regeneration ideas)
Rebuttal of FofPH Claims made to the European Parliament on 15 Jul 10.

True Friends of Penzance & Isles of Scilly

An umbrella group for individuals and organizations supporting Penzance Harbour developments (Option A), part of the Isles of Scilly Ferry Link Project. Communications/Secretary: Dick Cliffe support@truefriend.org.uk Tel; 01736 331734. Spokesperson: Rebecca Farrington spokesperson@truefriend.org.uk Mob: 0777 999 8590.