

To Managing Authority, project CB94 30MILES

Central Baltic Programme 2014-2020
C/O Regional Council of Southwest Finland
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Re-evaluation request

Kotka Maritime Research Centre respectfully asks the Managing Authority to re-evaluate the recovery decision 25.6.2025 based on the information below from the Municipality of Pyhtää regarding the situation concerning Keihässalmi small boat harbour development.

The Keihässalmi small port, that was supported by the CB Programme and ERDF funds, is in ongoing development. The goal of the Municipality of Pyhtää and the current owner of the area, Hitis Kiinteistöt Oy, are working together in order to have the port area operate as a small boat and guest harbour as planned in the project application. Unfortunately the development has been significantly delayed due to complaints during several development phases.

First, during the zoning of the area complaints regarding the detailed plan of the area delayed the development of the area and small port. The zoning of the area was finalized Q3/2022 after complaint processes. Shortly after that new complaints concerning the street plan stalled the implementation of plans again. Altogether the complaint processes have delayed the development of the area for several years.

The ownership of the area has changed less than 10 years after the projects end but this has not changed the plans for the area. The port was owned by Pyhtää Municipality and has been sold to a private owner in 2022. Pyhtää Municipality chose to sell the area because it was foreseen, that the new owner has better knowhow and resources to develop the area (residential and small port area and guest harbour with complementing services).

The Municipality does not see the sale of the area has given undue advantage to the new owner also taking into account that the streets and parking areas will be returned to the ownership of the municipality after they are built and improved by the current owner, Hitis Kiinteistöt.

From the municipality's view there has not been a substantial change in conditions that would undermine the original objectives of the project. The current private owner of the area, Hitis Kiinteistöt Oy plans development of residential area and small port on the site. The development of the port is included in the contract of sale (Kauppakirja 2.12.2022) between the municipality and the company (excerpt of contract translated below)

The buyer (Hitis Kiinteistöt Oy) aims to build a marina with 110-120 boat berths according to the following schedule, calculated after the local plan becomes legally valid: at least thirty percent of the boat berths within two years, fifty percent within six years and eighty percent within ten years. The buyer is responsible for purchasing or renting the water area in the boat dock area from the water area owner and obtaining the necessary water work permits.

The buyer is committed to creating the Saaristokylä (Archipelago Village) business idea for the area. The buyer is also responsible for marketing the area and recruiting other operators for the area. The seller is committed to assisting in the search for operators and

marketing the area. The buyer is responsible for the maintenance and development of the fishing harbour.

The small port harbour is in the detailed plan, that is now legally valid. The plan to develop the area accordingly has not changed and the development of the area is in progress. At the moment the detailed construction plans for the roads and parking area are being made. The bidding process is planned for August and after that the construction of the road and parking areas are planned to be started.

Hitis Kiinteistöt is responsible for building the streets and according to the contract with the municipality, the streets and parking area will be returned to the municipality. Thus areas improved and landscaped with ERDF-funding around the port will be returned to the ownership of Pyhtää municipality after they are built by Hitis Kiinteistöt, which adds to the value of these areas.

The building of the small port and guest harbour dock area is in the plans of Hitis Kiinteistöt. The company is planning to go forward with development of the dock area when they have an agreement with the current owner of the water area. This agreement is needed to be able to proceed with building the marina.

The access to the slip in the port was closed temporarily by Hitis Kiinteistöt, but only for the summer of 2024 because of the complaint situation. The rest of the surrounding area was in public use even during this time. In the beginning of March 2025 the slip has been open and freely in use for the public as is the whole area. Hitis Kiinteistöt has also made drawings for developing restaurant services in the fishing port building this spring.

The improved facilities in the port (sauna, service building) are not currently usable for boaters, maritime tourists or public, but according to plan, will be in the future. This is also due to the delays in developing the area. The improvements to the facilities were made during the 30 Miles -project to keep the buildings in condition to be able to be used and developed further when the guest port development is possible.

As a conclusion, we do not concur with the notion that the objectives of the initial programme have not or may not be achieved, while admitting that the ownership of the area has at least partially changed. The objective is still firmly the development of the area in a way that benefits visitors and everyone living in the area. As of today the area is in public use and the development of the port is in motion, while delayed due to complaints.

8.7.2025

KMRA, Meriturvallisuuden ja -liikenteen tutkimusyhdistys ry, as the Lead Partner of project CB94 30MILES,