



South East Marine Association (SEAMA) Medway Core Strategy

1. The Association (SEAMA) supports Policy CS25 (particularly bullet points 2 & 3) and therefore could not ordinarily expect to be invited to take part in the public examination.
2. However SEAMA is prompted to seek such appearance following the representations made by Peel Ports. The present owners acquired Chatham Docks in full knowledge of their condition including the need to renovate the dock gates. That need had been known since disposal to Medway Ports following closure of the Royal Naval Dockyard. Many years have passed during which the owners could have undertaken repairs utilizing the income available. It is bizarre for it now to be contended that a supermarket is necessary, *inter alia*, for that purpose; especially bizarre since it is contended that Policy CS25 "*could be interpreted to prevent the necessary reinvestment in the site through rationalisation and redevelopment to enable the continued use of Chatham Docks as a commercial port*".
3. The current availability of vacant possession is pleaded in support of non-port related redevelopment. That situation is entirely the result of the owner's ambition for non-port related re-development in that it has refused to grant new leases which would enable others to make investments even if the owner will not do so.
4. In short the owner desires to get away from the constraints of having acquired a working port which needs investment so that it can "*create higher value and density uses on the under-utilised parts of the site*" i.e. to undertake more profitable residential, retail, hotel, conference facility and similar development.
5. Port operations are incompatible with exactly the uses suggested by the owners. Efficiency requires vessels to arrive and depart and to be loaded and unloaded at all hours and are particularly bad neighbours with residential development even when not immediately adjacent. Evidence of that is contained in some of the residents' representations. Modern legislation can be used to curtail or even eliminate existing noisy development.
6. Unlike superseded national policy, the government's recent ports policy document is restricted to new port facilities and expansion of existing ones. SEAMA has been concerned that the established national policy on safeguarding port facilities should not be lost and the Minister's letter dated 22nd March 2012 is attached. The Safeguarding policy is at paragraph 17 (particularly bullet point 2) of the document to which the Minister refers.
7. The modifications proposed by The Peel Group would constitute "main modifications". They should in any event be rejected.

South East Marine Association

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26 MAR 2012

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Your Ref: 173/12/JM

22 MAR 2012

Ken Gordon

Thank you for your letter of 24 February to Greg Clark, enclosing correspondence from your constituent, Brian Kingsley-Smith of SE Marine Association, Seaspeed International Ltd, PO Box 446, Maidstone, ME15 8XZ about the draft National Planning Policy Framework relating particularly to the recently published National Policy Statement for Ports. I am replying as Minister responsible for Ports.

I would like to reassure your constituent that the recently designated National Policy Statement (NPS) continues to emphasise, in the development of ports, the desirability of the reduction of road traffic where possible. Section 5.4.14 states:

"The modal share of traffic entering and leaving the port needs to be considered objectively in the context of external congestion and environmental costs. Broadly speaking, rail and coastal or inland shipping should be encouraged over road transport..."

The NPS also includes specific guidance in relation to location of noisy activities within ports, and mitigation. It is beyond the scope of the NPS to give guidance on the location of residential properties in relation to noise, as is currently addressed by PPG24.

The ports NPS is specifically related to new port development applications and it is for this reason and not by oversight, that safeguarding is not discussed there. However, the policy on wharf safeguarding in the 2007 Interim Report on ports policy has not been revoked, and remains applicable.

*Regards
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