

# **Partial Local Plan Review of the South Malta Local Plan (2006)**

**Sites at Triq il-Marlocc and the Junction between  
Triq il-Marlocc, Triq San Guzepp and  
Triq Salvu Astarita, Zabbar**

**Public Consultation Draft**



**December 2020**

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## **1.0 Introduction and Scope**

- 1.1 This partial local plan review is intended to enable the implementation of a green urban open space project by rezoning for development a planned green open space at Triq il-Marlocc, Zabbar (indicated as Site 1 in Figure 1 ), and zoning an alternative site currently made up of a road space junction between Triq il-Marlocc, Triq San Guzepp and Triq Salvu Astarita, Zabbar (indicated as Site 2 in Figure 1), as a green public open space, at the expense of the owner/s of Site 1, without prejudicing proper traffic circulation and public parking provision while ensuring that there is a net public gain from the re-zoning exercise
- 1.2 The Executive Council has agreed to initiate this partial review of the South Malta Local Plan following which the responsible Minister endorsed the objectives to be issued for public consultation, in terms of article 41(2) of the Development Planning Act (Cap 552).
- 1.3 The Temporary Provision Schemes (TPS) zoned Site 1 as a green area and Map ZA 2-Zabbar Policy Map of South Malta Local Plan (2006) retained the zoning of the TPS, subject to general policy SMSE 04 - Public urban open spaces and green areas. Map ZA A8 – Changes to Scheme 56 Zabbar modified the layout of the green open space, considering existing building within the originally zoned green space. Site 1 is privately owned and consequently the scope of the policy to provide additional public urban open space has not materialised.
- 1.4 Site 2 is located further down from Site 1 along Triq il-Marlocc, is government owned and is currently a road junction enclosed by Triq il-Marlocc, Triq San Guzepp and Triq Salvu Astarita, located within the the residential area of Zabbar.
- 1.5 The partial review process involves the amendment Maps ZA 2 Zabbar (Urban South) Policy Map, Map ZA A8 – Changes to Scheme 56 Zabbar, and Map ZA 4 Zabbar (South) Building Heights Map. The applicable policies: SMHO 02-Residential areas and SMSE 04-Public open spaces, squares and green areas; do not require to be amended as the



## 2.0 Objectives

2.1 The Objectives for the Partial Local Plan Review of the South Malta Local Plan a (2006) as agreed by the Executive Council and endorsed by Minister, are as follows:

“To enable the implementation of a green urban open space project by rezoning for development a planned green open space at Triq il-Marlocc, Zabbar (indicated as Site 1 in the attached site plan), and zoning an alternative site currently made up of a road space junction between Triq il-Marlocc, Triq San Guzepp and Triq Salvu Astarita, Zabbar (indicated as Site 2 in the attached site plan), as a green public open space, at the expense of the owner/s of Site 1, without prejudicing proper traffic circulation and public parking provision while ensuring that there is a net public gain from the re-zoning exercise”.

### Public Consultation on Objectives

2.2 The Objectives for the Partial Local Plan Review were issued for an initial public consultation exercise between the 9<sup>th</sup> October and the 30<sup>th</sup> ~~October~~, October 2020. Six submissions were received which are included under Appendix 1: Public Consultation Submissions and Responses on Objectives of this report.

2.3 The submissions received highlighted the following issues:

- Objections to the proposal as it:
  - Will result in the loss of a green area which will be replaced by a roundabout,
  - Both spaces should be zoned as green areas,
- Proposal promotes further intensification and cumulative impact of private development within the residential area,
- The proposal does away with the public/planning gain in favour of further development,

- Development of site 1 will increase parking and traffic circulation problems,
- Site 1 better suited as a public open space.
- Site 2 had already been upgraded and resulted in a relatively safer junction for traffic circulation,
- Site 2 would become a glorified roundabout and unsafe for public enjoyment,
- More open spaces should be provided in Zabbar as it lacks adequate provision,
- Generic submission with guidelines and measure that should be used in order to render public open spaces more friendly in terms of uses to the older population,
- A no objection as long as this is replaced with at a suitable green, urban, public, open space and that there is a net public gain from the re-zoning exercise.
- To introduce green infrastructure so as to create high quality green area for the benefit of the environment and of local citizens.

### **3.0 Preliminary Considerations**

- 3.1 The process was initiated by the owners of Site 1 through the submission of a planning control application requesting the rezoning of a privately-owned site designated as a green area in the South Malta Local Plan Map ZA A8. Since according to Article 54 of the Development Planning Act, the proposal could not be processed as a planning control application, it was withdrawn. Notwithstanding, the green area on the private land is unlikely to materialise since the owners have no intention to develop a public garden. Consequently, it would potentially remain in its current situation unless it is expropriated and developed as such by government.
- 3.2 Discussions on a potential partial local plan review were initiated. The applicant's architect proposed to relocate the green area onto a currently sterile urban space consisting of a tarmacked road junction. The relocation was considered as a potential option as long as:
- a) the resulting surface area of public open space is not less than that currently zoned;
  - b) there is no objection from the owner/s;
  - c) the traffic circulation around the alternative site is improved;
  - d) the parking area in the area is better organised;
  - e) the upgrading works is funded by the owner of Site 1.
- 3.3 Further considerations were required for the rezoning of site 1 including:
- a) the land-uses and height limitations of the surrounding area;
  - b) past development permissions issued within the area particularly those having access onto the schemed street off Triq il-Marlocc;
  - c) the proximity of the site to the Urban Conservation Area;
  - d) third party development rights.
- 3.4 Apart from the requirement to not reduce the area of the currently zoned green area, the extent and design of the alternative site as proposed by the proponents, was subject to consultations with Lands Authority who confirmed that Site 2 is government property and



## 4.0 Applicable Local Plan Policies

### South Malta Local Plan

#### 4.1 The applicable policies related to this partial review are

SMHO 02 - Residential Areas and Residential Priority Areas, which identifies and guides the acceptable land uses within the residential area and would be applicable to Site 1.

SMSE 04 - Public urban open spaces, squares and Green areas, which encourages the development or upgrading as may be the case of the sites zoned as public urban open spaces for public recreational facilities in the form of children play area or landscaped seating areas for use by the general public. This policy is applicable to the rezoned Sites2.

Policy SMCO 01 - Urban Conservation Areas and Design Priority Areas, states that to respect the roofline and aspects of street character in identified areas outside UCAs and Design Priority Areas, Building Heights within such areas are indicated as three floors. No semi-basements would be allowed in these areas. This height is applicable to rezoned Site 1.

Map ZA 2 Zabbar (Urban South) Policy map indicates the current zoning of both sites being addressed by this review – This review amends Map ZA 2

Map ZA 4 Zabbar (Urban South) Building Heights map indicates the height limitation of the area surrounding Site 1 as 3 floors with basement subject to policy SMCO 01 – This review amends Map ZA 4 due to the rezoning of site 1 which adopts the height limitation of the surrounding.

Map ZA A8 showing the changes from the Zabbar Scheme 56 – This review amends Map ZA A8.





## 5.0 Recommendation

- 5.1 This partial review is proposing the rezoning of Site 1 located at Triq il-Marlocc from a green area to a developable site within the residential area subject to South Malta Local Plan general policy SMHO 02 and having a building height of three floors with basement. General policy SMCO 01 on Urban conservation areas and design priority areas, will also apply (Refer to Map Zabbar Site 1 Proposed).
- 5.2 As a planning gain from this rezoning an alternative site currently consisting of an asphalted road junction enclosed by Triq il-Marlocc, Triq San Guzepp and Triq Salvu Astarita is being zoned for the development of a public urban open space, in line with South Malta Local Plan (2006) general policy SMSE 04 (Refer to Map Zabbar Site 2 Proposed).
- 5.3 The rezoning of Site 1 to residential area is subject to the following conditions:
- i. Site 1 is zoned as a residential area and is subject to SMLP policy SMHO 02 - Residential Areas,
  - ii. The building height of the rezoned Site 1 shall not exceed three floors with basement and is subject to policy SMLP policy SMCO 01 - Urban Conservation Areas and Deign Priority Areas,
  - iii. The granting of development permissions on Site 1 is subject to a financial planning gain which shall be specifically allocated for the development of the public open space at Site 2. The financial contribution shall be on a pro-rata basis of Eur 500 for every square meters of site area that shall be granted development permission within Site 1.

## **6.0 Way Forward**

- 6.1 The Planning Directorate recommends the Executive Council to endorse this Partial Review to The South Malta Local Plan (2006), Zabbar and publish it for a six-week public consultation period and its submission to the Parliamentary Standing Committee.

**Appendix 1: Maps showing the current zoning and the proposed zoning of Site 1 and Site 2**



S.S. No.: 0000 Scale: 1:2500



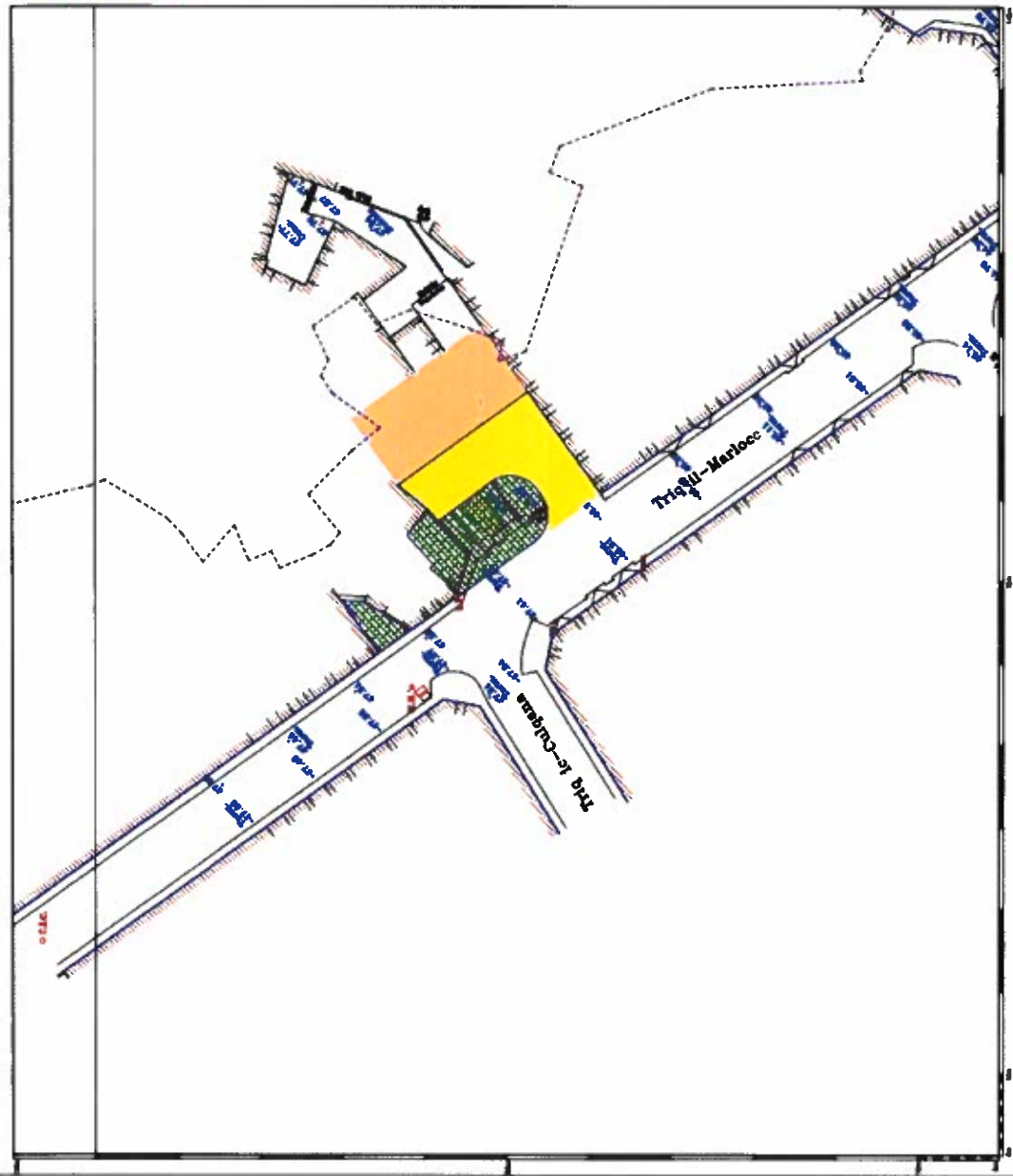
**Subsidiary Plan  
Minor Modification**

**Zabbar**

**Site 1 - Current**

Scale:	1:500	Survey No.:	455E1-20
City Name:	U.T.A.	U.S. Coordinates:	54278076448
Block Name:	6,9963	Land Use:	R.S.L.
Survey Completion Date:	2/9/2009	Plan Completion Date:	18/12/2009
Survey Created By:	M. Al-Argab (L.S.)	Plan Created By:	J. F. Williams
Checked By:	Pauline D. Gatt	Checked By:	Pauline D. Gatt
Checked Date:		Checked Date:	
Checked By:		Checked By:	
Checked Date:		Checked Date:	
Checked By:		Checked By:	
Checked Date:		Checked Date:	

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- Existing Field Walls
- Existing Building
- Existing Vegetation
- Street Furniture
- Spot Level
- Formation Level
- Limit to Development
- Urban Conservation Area
- Alignment
- Open space
- Terraced Development (Residential)



S.S. No.: 0000 Scale: 1:2500  
**PLANNING AUTHORITY**

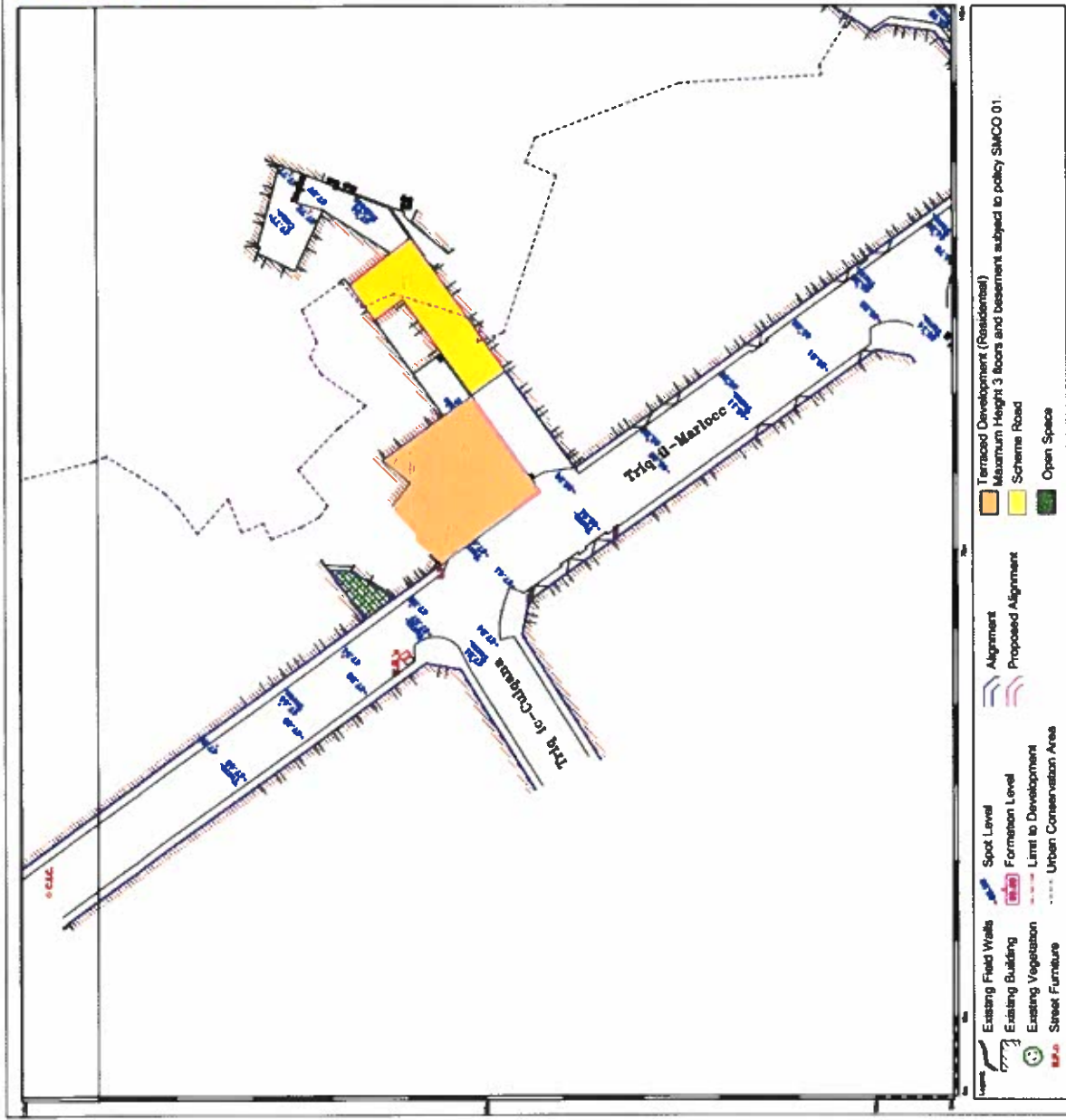
**Subsidiary Plan  
 Minor Modification**

**Zabbar**

**Site 1 - Proposed**

Scale	1:500	Survey No.	45SE1-20
Old Name	U.T.A.	Old Contaminant	91320780-09
Survey Completion Date	2/9/2009	Plot Completion Date	18/12/2009
Survey Created By	M. Azizgambh (E307)	Plot Created By	J.P. Paul
Prepared By		Checked by	
Checked by		Drawn by	
Approved by		Scale	1:500

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PLANNING AUTHORITY



Subsidiary Plan  
Minor Modification

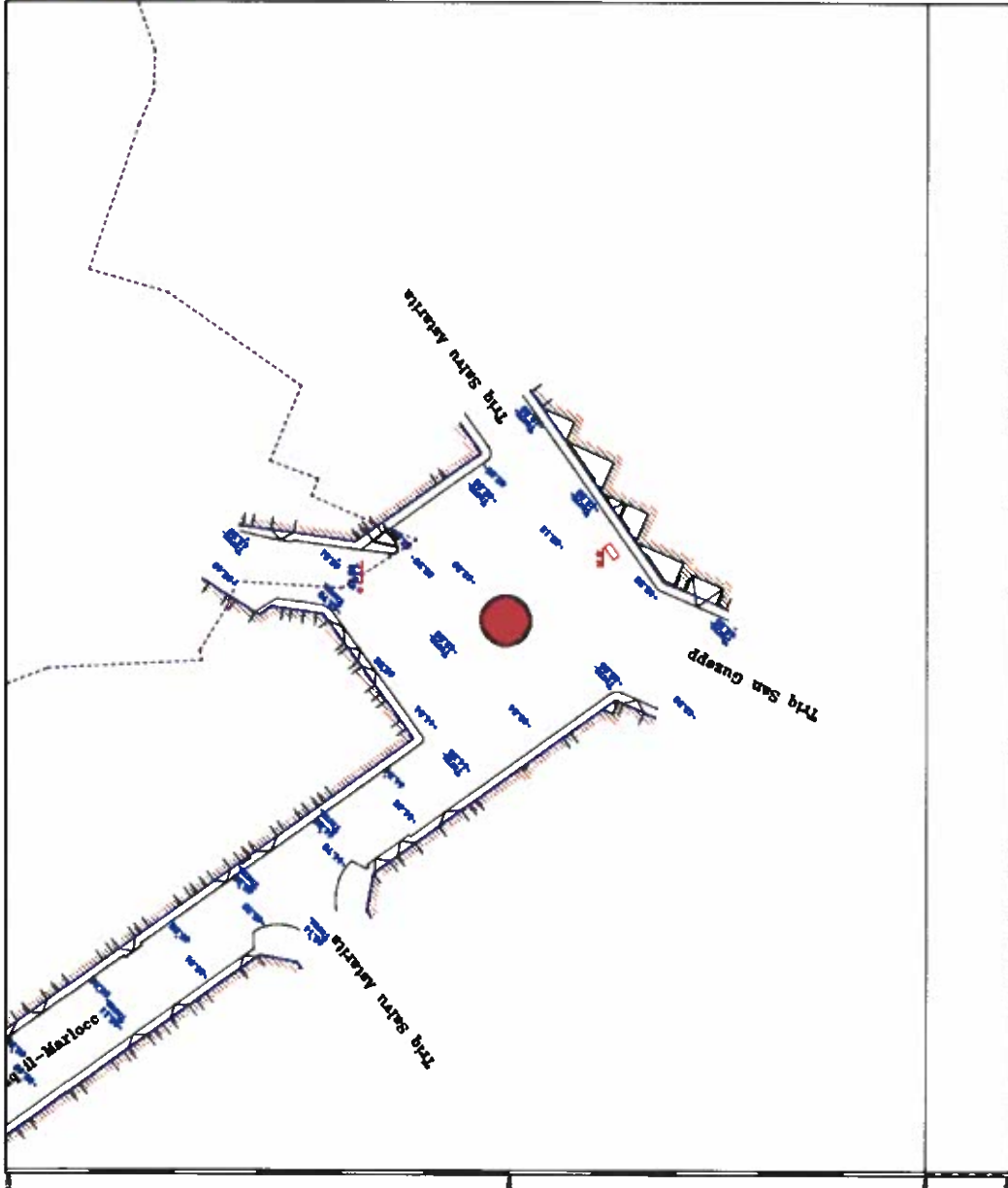
**Zabbar**

**Site 2 - Current**

Survey No.	455E1-20
U.T.N.	6.10063
Plot Completion Date	18/12/2003
Plot Owner	M. Alazzam (L.S.P)
Plot Area	1.500
Plot No.	6.10063
Plot Completion Date	18/12/2003
Plot Owner	M. Alazzam (L.S.P)

Checked by	Checked by
Checked by	Checked by
Checked by	Checked by
Checked by	Checked by

The information on this plan has been carefully checked for accuracy of the data of the site and the information on the site plan has been checked for accuracy of the information on the site plan.



- Existing Field Walls
- Existing Building
- Existing Vegetation
- Street Furniture
- Spot Level
- Formation Level
- Limit to Development
- Urban Conservation Area
- Alignment



S.S. No.: 0000 Scale: 1:2500



**Subsidiary Plan  
Minor Modification**

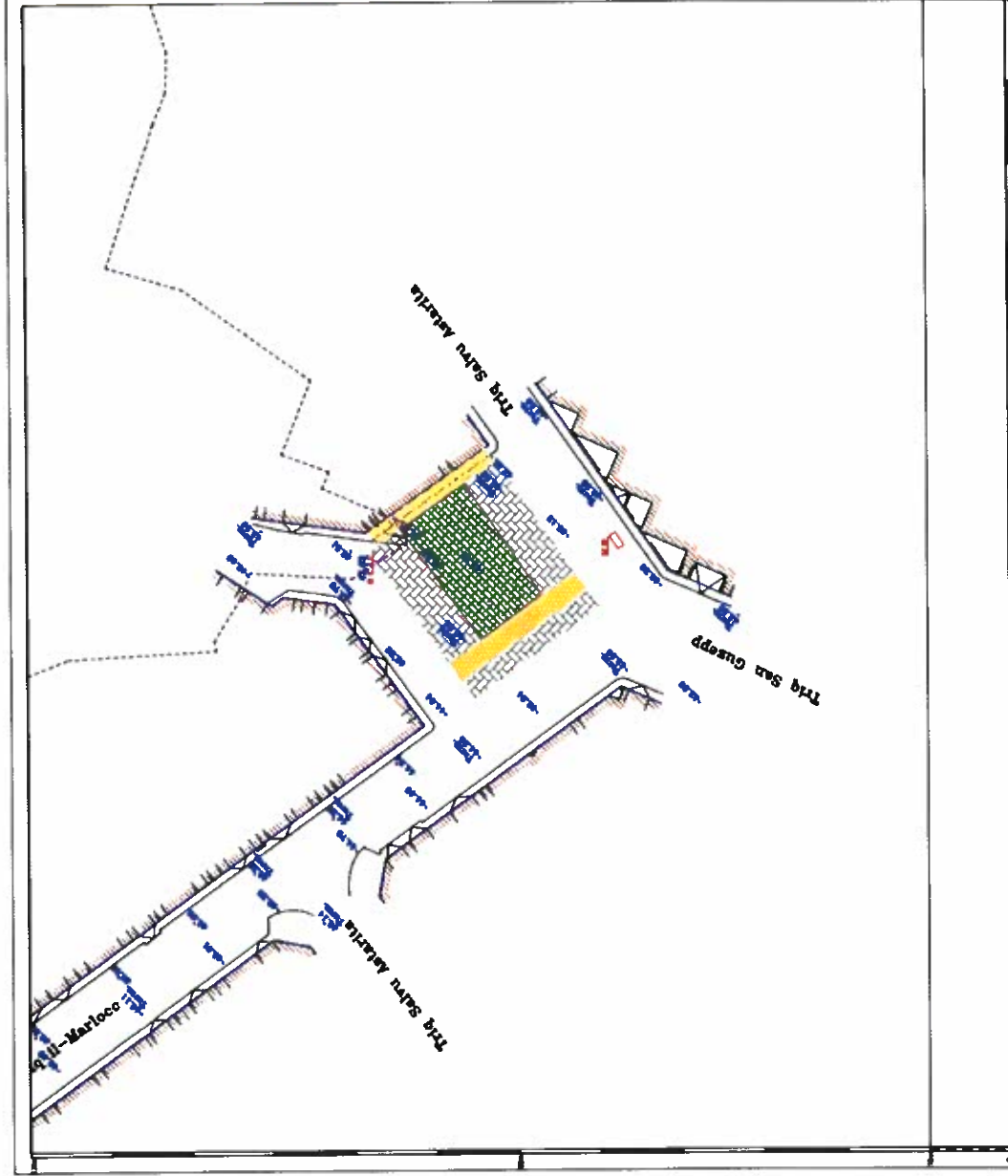
**Zabbar**

**Site 2 - Proposed**

Survey No.: 455E1-20  
 U.T.A. No.: 455E1-20  
 Survey Completion Date: 2/17/2009  
 Survey Checked By: H. Alzoubair (C.S.O.)  
 U.T.A. No.: 455E1-20  
 Survey Completion Date: 2/17/2009  
 Survey Checked By: H. Alzoubair (C.S.O.)

Client Name	Client Address	Client Contact

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- Existing Field Walls
- Spot Level
- Formation Level
- Limit to Development
- Urban Conservation Area
- Alignment
- Proposed Alignment
- Green Public Open Space
- Pedestrian footpath
- Parking Area

## **Appendix 2: Public Consultation Submissions and Responses on Objectives**

	Name/ Company	Date	Comments Received	Response
SMLP1 001	Mr. Sergio Sammut	18/10/2020	<p>The proposal is very disappointing for the general public. Totally unacceptable.</p> <p>The rezoning is a clear, lose - lose. A green open public space is lost and the roundabout remains a roundabout.</p> <p>I am formally objecting to this rezoning review and sincerely ask the Planning Authority to stop taking the local residents for a ride.</p>	<p>The scope of this review is to allocate an alternative public open space to private space that had been zoned as a green area but has remote possibility of being implemented as it would add financial burden on public finances. Through the rezoning of the current green area to residential development, the developer shall be expected to finance the newly proposed public open space as a planning gain .</p>
SMLP1 002	Ms. Charlene Spalding	25/10/2020	<p>The Planning Authority has been requested by the Government to initiate a local plan review of the South Malta Local Plan to enable the implementation of a green urban open space project by rezoning a planned green open space at Triq il-Marlocc, Zabbar.</p> <p>As local residents, my family and I object to this project.</p>	<p>The scope of this review is to allocate an alternative public open space to private space that had been zoned as a green area but has remote possibility of being implemented as</p>

			<p>There are more than enough buildings surrounding the area.</p> <p>The green urban open space planned will not make up for the amount of new building that will take place.</p> <p>If the planning authority wants to recreate a green space, it shouldn't be at the detriment of another building.</p> <p>Instead, we suggest that both areas to be recreated into green spaces. Malta and all the residents surely want and need it !</p> <p>Hence, we object to this project and hope that this can be looked into again.</p>	<p>it would add financial burden on public finances. Through the rezoning of the current green area to residential development, the developer shall be expected to finance the newly proposed public open space as a planning gain .</p>
<p>SMLP1 003</p>	<p>Mr &amp; Mrs Cutajar</p>	<p>28/10/2020</p>	<p>Reference is made to the public consultation process being carried out to rezone a public open space site in Triq il-Marloċċ (Site 1). The review is also suggesting that rezoning of this land is to be associated with another nearby site forming the junction between the aforementioned street, Triq San Guzepp and Triq Salvu Astarita (Site 2).</p> <p>The undersigned hereby disagrees with the stated objective (reproduced below) as it appears, through the proposed text, that the Authority is even considering rezoning Site 1 for any type of development.</p> <p>'To enable the implementation of a green urban open space project by rezoning for development a planned green open space at Triq il-Marlocc, Zabbar (indicated as Site 1 in the attached site plan), and zoning an alternative site currently made up of a road space junction between Triq il-Marlocc, Triq San Guzepp and Triq Salvu Astarita, Zabbar (indicated as Site 2</p>	<p>The scope of this review is to allocate an alternative public open space to private space that had been zoned as a green area but has remote possibility of being implemented as it would add financial burden on public finances. Through the rezoning of the current green area to residential development, the developer shall be expected to finance the</p>

	<p>in the attached site plan), as a green public open space, at the expense of the owner/s of Site 1, without prejudicing proper traffic circulation and public parking provision while ensuring that there is a net public gain from the re-zoning exercise”.</p> <p><b>BACKGROUND BEHIND EXISTING LAND USE</b></p> <p>Site 1 partly contains two, street-level garages with a frontage on Triq il-Marloċċ. These garages adjoin (from the rear end) an old residential building. The latter contains a front door entrance which may be accessed from a long-winding, bifurcated alley known as Sqaq Lajri (said cul-de-sac forms part of Żabbar's Urban Conservation Area). The developed (garages) footprint encroaches on the existing public open space designation. Informal parking (on a partly-asphalted section of public streetspace) occupies the remaining part of the site where the rezoning is being considered. The informal parking faces a one-floored residential building flanking the UCA building just mentioned. This site was earmarked (at least since the 1980s) as one of only two public open spaces/ green areas planned for this residential neighbourhood located between the UCA and urbanised portion of Marsascula bypass (Triq Villabate).</p> <p>On the other hand, Site 2 consists of a gently-sloping, tarmacked 'square' /road space. Street paint markings in this area, and other traffic calming material (including, but not limited to, a raised roundabout structure which has been installed there since 2017), already mitigate the somewhat awkward planimetric constraints of this site which is situated at the</p>	<p>newly proposed public open space as a planning gain .</p>
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	<p>respective edge of two schemed streets and another street located inside the locality's historic core (UCA).</p> <p><b>(1) INHERENT FALLACIOUS 'STRATEGY' BEHIND THE CURRENT REZONING PROPOSAL</b></p> <p>The proposal, to associate and consequently transform the current public land forming Site1 - predictably from a green public open space to residential development - is inherently wrong, ambiguous and not according to established sustainable development principles. It also does not make planning sense from a land use and transport planning standpoint. Whoever prepared this consultation even had the audacity to state that: "...there is net public gain from the re-zoning exercise"!</p> <p>This is certainly not a consultation exercise drafted with an underlying intention to maintain accessibility/return BOTH currently-designated open spaces to the general public. On the contrary, it is promoting further intensification of private development within this residential area - which is notoriously devoid of any formalised public open spaces - because this is what is likely to result if the Site 1 rezoning proposed in this consultation is granted by the Authority. It will permit a significant private gain to the owner/s (or prospective developers) of this portion of land currently zoned for public use if this land (site 1) is developed as proposed.</p> <p>The main objective behind this initiative is even considered semantically deceptive (to say the least) unless one notes the underlying intention behind the wording used which appears to</p>	<p>Rezoning Site 1 to residential development is an extension to the adjacent existing and planned development (in the Local Plan) and making better use of land.</p>
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	<p>be diametrically opposite to the need to restore public trust in this planning process.</p> <p>Any proposal, entertaining additional built development of this land (Site 1), would further increase the cumulative impact of development in this area as the new building would then 'complement' the already multi-floored development recently constructed which lies next to the planned open space designation. This newly-completed building (separated from the site under review by an unfinished private road) altered, in a permanent manner, the (mostly) uniform streetscape qualities of this predominantly medium-density residential street (Triq il-Marlocc).</p>	
	<p>The public consultation proposal will certainly compound the aforementioned negative visual impact generated by this recently-constructed building.</p>	
	<p>It is also clear that the intention to propose/ re-assign a development zoning to a site - in the glaring absence of a project management plan and/or public funding safeguards to the other site (i.e. Site 2) - is not a sound approach grounded in common sense. Contrary to what is implied in the objectives behind this public consultation exercise, the proposal does away with the public/planning gain in favour of further development steered by private interests.</p> <p>On the other hand, Site 2 was already redesigned for transport junction improvement a few years ago. This street upgrade resulted in a relatively safer junction for traffic circulation (Site 2) which effectively ameliorated the previous situation. Thus, it</p>	<p>The redesign will still aim at creating a safe environment for both users of the urban open space and other adjacent road users.</p>

appears that there is no justifiable reason to redo it "at the owner/s expense" while waiting until a new development project for Site 1 - possibly a block of apartments and garages - materialises at the expense of the common good.

**(2) PARKING PROVISION**

The upper portion of Triq il-Marloċċ is already significantly impacted by serious parking problems presumably attributable to its close proximity to the historical core (UCA). Moreover, the presence of a sizeable commercial retail outlet located within a nearby street at the edge of Żabbar's UCA (in Triq Bajjada) accentuates this issue. Available spaces are taken up daily and usually by haphazard parking which, in certain instances, spills over to adjacent streets.

Predictably, the potential development of street-level (or possibly semi-basement) garages on this site is likely to increase the already-significant traffic circulation problems observed in this area. This apart from intensifying the problem of poor supply of public parking spaces within an area which is being gradually transformed into an uninterrupted row of smaller multi-storey (and multi-household) residential units.

Also, the additional parking demand and increase in traffic flow volume should be seen against the present supply of privately-owned street-level, garages mostly located in the vicinity of site 1.

**(3) TRAFFIC CONGESTION CONSIDERATIONS**

As one of the residents in this area, I can safely confirm that Site 1 is definitely not currently impacted by the continuous traffic

flows seen in Site 2. For this reason alone, it is understood that it is better suited as a public open space. Its location, directly at the entrance to Triq Ċulqana, gives credence to this assertion.

Site 2 itself would inevitably act as a 'glorified' roundabout of public space if developed as proposed in this public consultation. As a result, this area is likely to become significantly unsafe for public enjoyment due to fact that it is situated very close to Triq Villabate and the almost fully-developed streetscape of Triq il-Kaħwiela both of which act/ will eventually function as traffic 'corridor' bypasses linking Triq il-Wied (and parts of Marsascala) with the busier distributory traffic flowing between Żabbar-Fgura/ Tarxien nodes.

**(4) LACK OF PUBLIC AMENITIES AND RESIDENTIAL AREA DENSITY CONSIDERATIONS**

The further intensification of additional residential development (earmarked for Site 1) is certainly not motivated by the safeguarding of the common good. Which means that there is no effort spared to satisfy the local plan requirement for having a good and adequately distributed provision of suitable AND safe open spaces where the general public could enjoy some rest, apart from the need to compensate for the continuous tasteless artificial setting characterising this part of the island.

On a strategic planning level, it was understood that the existing zoning was originally intended to offer residents another public recreational space in a locality which already largely suffers from lack of open spaces and/or public recreational sites. Sadly, this pressure to develop every nook and cranny should be seen with a number of instances, where currently-zoned land in other

	<p>parts of Żabbar, was never developed for its intended planning purpose (Misraħ San Nikola, located at the southern end of Triq is-Santwarju, is a case in point) despite being designated in the 2006 local plan for this specific use.</p> <p>Żabbar is already characterised by one the lowest open space per person ratios within the local plan area. The proposal, as it stands, adds absolutely nothing to initiatives intended to reduce the open space deficit experienced in this locality. The aforementioned open space area per resident ratio observed in this locality would be further compromised by disguising the pro-development re-zoning of this piece of land instead of retaining its current designation.</p> <p>Instead more open spaces footprint (not less) are required in an urban area already characterised by lack of suitable provision.</p> <p>No new public gardens have been created for a good number of years (except for the rehabilitation of existing ones and linear landscaping works along Triq il-Labour). Worse, several parts of this locality surrounding the historical area (and this area is no exception) are being rapidly populated with mostly three-floor units (with penthouses in some cases) in terms of the current Local Plan policy framework.</p> <p>-----</p> <p><b>PROPOSED WAY FORWARD</b></p> <p>The potential enjoyment of a 'revamped' (public open) space in Site 2 not envisaged in the existing approved Local Plan at the</p>

		<p>expense of Site 1 (which would be sacrificed for more development) is likely to result in the following negative impacts:</p> <ul style="list-style-type: none"> <li>a) the creation of a useless public open space in an area impacted by traffic at the expense of a comparatively 'quieter' area which would be sacrificed for development,</li> <li>b) a further deterioration of ambient air quality within this significantly-populated residential neighbourhood,</li> <li>b) additional and avoidable public health security risks for any pedestrians passing through the redesigned spatial arrangement, and</li> <li>c) risks related to debilitated personal health for whoever decides to commute to this area for brief enjoyment of a redeveloped site 2 (that is, from a public street to a public space)!</li> </ul> <p>An alternative solution to this public consultation proposal should instead be to swap whatever re-zoned public enjoyment solution is being proposed in Site 2 (i.e. presumably a small green/ hard landscaped open space inclusive of a seating area) to the area of land situated within Triq il-Marlocc (Site 1). In this way, both the traffic circulation aspect and current parking provision in would not be compromised.</p> <p>The involvement of the Local Council should also be sought at this stage (i.e. without further delay) in order to put forward a doable project proposal properly designed to tap financial assistance delivered by the PA-administered Urban Improvements Fund to implement this project in Site 1. Furthermore, any encroaching properties on this open space</p>	
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SMLP1 004	Mr Anthony Ellul	30/10/2020	<p>zoning, which are found not to have the necessary planning permissions, should be fast-tracked for removal.</p> <p>The Malta Chamber of Planners wish to make the following comments re the above consultation. These are initial comments with regards to the objective set which is reproduced hereunder:-</p> <p>“To enable the implementation of a green urban open space project by rezoning for development a planned green open space at Triq il-Marlocc, Zabbar (indicated as Site 1 in the attached site plan), and zoning an alternative site currently made up of a road space junction between Triq il-Marlocc, Triq San Guzepp and Triq Salvu Astarita, Zabbar (indicated as Site 2 in the attached site plan), as a green public open space, at the expense of the owner/s of Site 1, without prejudicing proper traffic circulation and public parking provision while ensuring that there is a net public gain from the re-zoning exercise”.</p> <p>The Chamber finds no objection to extending the building line since what is currently designated as a public open space in Triq il-Marlocc is a parking area and cannot serve as a proper public open space. Nonetheless, the existing buildings overlooking this green space need to retain access.</p> <p>However, proposing the junction at Triq Astarita as a green public open space is not recommended since this will be more of a roundabout and an open space here will certainly not be used by the public. A proper area is to be found which will be more suitable for use by the public. This area is a junction so it is already an open space so nothing is being gained by this proposal for the public in this area. One has to avoid mistakes as has been the case in Mellieha where EIPP funds were spent on projects which failed.</p>	
			<p>The redesign of Site 2 will still aim at creating a safe environment for both users of the urban open space and other adjacent road users.</p>	

SMLP1 005	Dr Mary Vella Commiss ioner for Older Persons	30/10/2020	<p>The Chamber will make further comments at a later stage once more details on the planning parameters for this partial review are issued for public consultation.</p> <p><b>Purpose</b> -With reference to the open public consultation of the Partial Review of the South Malta Local Plan for a site in Zabbar (Phase 1), launched by the Ministry for the Environment, Climate Change and Planning (Planning Authority) on 14 October 20201 hereunder please find the input of the Commissioner for Older Persons.</p> <p><b>Background</b> - Article 18 of the Commissioner for Older Persons Act (Cap. 553)2 stipulates that "(1) whenever it appears necessary or expedient, the Commissioner may carry out or cause to be carried out an Older Person Impact Statement relating to any decision or proposal on policy which affects older persons. (2) Any Older Person Impact Statement shall set out the probable impact on older persons of the decision or proposal on policy. (3) The Commissioner may publish the Older Person Impact Statement." It is within this context that the input is being provided in the afore-mentioned consultation.</p> <p><b>Our understanding of the proposal</b> - Our understanding of the proposal is "to enable the implementation of a green urban open space project by rezoning for development a planned green open space at Triq il-Marlocc, Zabbar (indicated as Site 1 in the attached site plan), and zoning an alternative site</p>	<p>Comments noted. Detailed design of urban open spaces shall be considered at development planning stage.</p>
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		<p>currently made up of a road space junction between Triq il-Marlocc, Triq San Guzepp and Triq Salvu Astarita, Zabbar (indicated as Site 2 in the site plan), as a green public open space, at the expense of the owner/s of Site 1, without prejudicing proper traffic circulation and public parking provision while ensuring that there is a net public gain from the re-zoning exercise”.</p> <p><b>Guiding principles for analysing the impact of the proposal on older persons</b> - In principle, older persons should be able to live in environments that are safe and adaptable to personal preferences and changing capacities. There is a felt need for urban rebuilding and development planning and law to pay special attention to the problems of the ageing, assisting in securing their social integration, whilst drawing attention to the need to take account of the functional capacity of the elderly in order to provide them with a better living environment and facilitate mobility and communication through the provision of adequate means of transport.</p> <p><b>Sizing up the situation relevant to the proposal</b> - In Malta, by the end of 2018, persons aged 65 and over made up 19 per cent of the total population. The estimated population of Zabbar on 1 January 2020 was 15,660 persons. Further quantitative analysis is limited due to the lack of publicly available data on older persons in Zabbar.</p>	
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	<p>The data does not obviously imply that the proposal will offer a solution at national or locality level to the potential issues arising above. Neither it assumes that the entire older population of Zabbar will be using the proposed green public open space. Furthermore, in the light of the COVID-19 pandemic and its impacts on older persons, the precautions as prescribed and mandated by the Superintendent of Public Health should be complied with by all, especially, those at most risk.</p> <p><b>Analysis of the proposal on older persons and Recommendations</b> - The surrounding environment is important for all especially older persons. The World Health Organisation noted that such green spaces are key to improving the age-friendliness of neighbourhoods. It is necessary to design such spaces for the promotion of healthy ageing to enhance preventive healthcare and relieve medical burdens.</p> <p>The Commissioner therefore welcomes the consideration of the proposed green urban open space. It supports the promotion of "ageing in place" in the community including putting in the infrastructure to promote the development of age-integrated communities. It is up to the responsible Local Council to then be creative to bring such spaces to life, once the project has been completed.</p> <p>The green public open space must keep in view the transportation, access, safety, and security needs of older</p>	
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	<p>persons. Its design should be age-friendly and ensure easy access to the space. We encourage attention to:</p> <ul style="list-style-type: none"> <li>• installing accessible washrooms if they fit in the area;</li> <li>• safe crosswalks (e.g., with appropriate crossing times, mid-block crosswalks on long streets, good visibility);</li> <li>• walkways would be in safe condition (e.g., have smooth surfaces, curb cuts, separate bike lanes, are wide, well lit during the night, clear of slippery material or water).</li> <li>• cameras that can provide additional security to users.</li> </ul>	
	<p>In addition, designers and operators of such green public spaces should ensure promotion and compliance with health and safety best practices, such as but not necessarily limited to:</p>	
	<ul style="list-style-type: none"> <li>• Public areas are clean and pleasant.</li> <li>• Green spaces and outdoor seating are sufficient in number, well maintained and safe.</li> <li>• Pavements are well maintained, free of obstructions and reserved for pedestrians.</li> <li>• Pavements are non-slip, wide enough for wheelchairs and have dropped curbs to road level.</li> <li>• Cycle paths are separate from pavements and other pedestrian walkways.</li> <li>• Outdoor safety is promoted by good street lighting, police patrols and community education.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Outdoor spaces are well signed outside and inside, with enough seating and toilets, accessible chair lifts, ramps, railings and stairs, and non-slip floors.</li> <li>• Fewer stairs to get into the area.</li> <li>• Accessible benches (which should also be an appropriate height for seniors) are located along sidewalks and are spaced at regular intervals.</li> <li>• Signage to include emergency numbers, e.g., ambulance/emergency, Police, Local Council, etc.</li> </ul> <p>For the associated traffic arrangements, we recommend amongst others, that:</p> <ul style="list-style-type: none"> <li>• Traffic flow is well regulated.</li> <li>• Traffic calming design, e.g., sleeping policemen, be considered.</li> <li>• Drivers give way to elderly pedestrians at intersections and pedestrian crossings.</li> <li>• Pedestrian crossings are sufficient in number and safe for elderly people with different levels of mobility, with non-slip markings, visual and audio cues and adequate crossing times.</li> <li>• Traffic signs and intersections are visible.</li> <li>• Parking and drop-off areas are safe for the elderly, sufficient in number and conveniently located.</li> </ul>	
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SMLP1 006	Sandro Bonanno (ERA)	30/10/2020	<p>If done well, the green public open space design promotes independent living by taking into account the needs of older persons, in particular, those with disabilities. The above can also contribute to the objectives of a net public gain.</p> <p><b>Conclusion</b> - Whilst taking the opportunity to thank the Ministry for the Environment, Climate Change and Planning (Planning Authority) for this consultation opportunity, we urge the Planning Authority and other relevant stakeholders in this project, to keep the above impacts on older persons in mind. Should you have any queries or requests for clarifications, kindly contact the undersigned. We thank you in anticipation and look forward to hearing from you.</p>	
			<p>1. Introduction</p> <p>The Environment and Resources Authority (ERA) welcomes the opportunity to comment on Phase 1 of the proposed South Malta Local Plan review concerning a site in Żabbar.</p> <p>These comments are provided without prejudice to ERA's review and comments on any eventual development projects that may emerge from the Local Plan change, when more detailed environmental assessment may be required. Depending on the nature, scale and context, proposed projects may also require different types of environmental assessments or other related screenings, as may be relevant.</p> <p>2. Main environmental issues</p> <p>ERA welcomes the proposed objective to compensate for the rezoning of a green open space at Triq il-Marloċċ at Haż-Żabbar</p>	<p>The scope of this review is to allocate an alternative public open space to private space that had been zoned as a green area but has remote possibility of being implemented as it would add financial burden on public finances. Through the rezoning of the current green area to residential development, the developer shall be</p>

	<p>(Site 1), by designating and implementing an alternative site (Site 2) as a green, urban public open space. Site 2, which is the alternative site for implementing the public green space, consists of a road junction at Triq San Ġużepp. This junction, together with Triq San Ġużepp are frequently used by motorists to re-connect from Triq Villabate to Misraħ San Ġakbu and the centre of Żabbar.</p> <p>The proposed objectives also specify that traffic circulation and public parking at this site needs to be maintained.</p> <p>In this regard, ERA has no objection to the proposed rezoning at Triq il-Marlocc, as long as this is replaced with a suitable green, urban, public, open space and that there is a net public gain from the re-zoning exercise (as also indicated in the objectives).</p> <p>It is also recommended that Phase 2 of this Local Plan review caters for the implementation of green infrastructure (in addition to an adequate green, public, open space), to create a high quality green area for the benefit of the environment and of local citizens. Any diversions created by the proposed rezoning need to be carefully planned and studied so as not to create any additional traffic congestion and therefore give rise to any increase in air and noise pollution.</p> <p><b>3. Conclusion</b></p> <p>ERA looks forward towards additional consultations, and remains available for any clarification, or further consultations via: <a href="mailto:era.policy@era.org.mt">era.policy@era.org.mt</a></p>	<p>expected to finance the newly proposed public open space as a planning gain.</p> <p>Detailed design of urban open spaces shall be considered at development planning stage.</p>
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