

Partial Review of the Grand Harbour Local Plan of 2002

Marsa Park Site (Policy GM15) Revised Draft



November 2016

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1.0 Introduction

1.1 Government has directed the Authority to undertake a Partial Local Plan Review of the Grand Harbour Local Plan, 2002, for the site shown in Figure 1 which is affected by Policy GM 15 (Marsa Park Development) and Policy GM24 (Marsa Sports Complex). This review is required to update the planning policy guidance for the area and to facilitate the development of sites located within the Marsa Park site.

1.2 The Government objectives for this Partial Review are as follows:

- **to realign the boundaries of the areas covered by policies GM15 – Marsa Park Development and GM24 – the Marsa Sports Complex to allow for consideration for the alternatives of Triq Dicembru 13;**
- **to re-evaluate the policy provisions in policy GM15 for the comprehensive planning of the Marsa Park Development Site and for the range and scale of the mix of land uses;**
- **to propose site specific land use and building height designations for different parcels of land within the Marsa Park development site.**

1.3 These objectives were published for consultation between the 3rd July, 2015 and 23rd July, 2015. Five submissions were received by the closing date of the this public consultation stage and a summary with the Planning Directorate responses are included as Appendix 2 to this report.

1.4 The second stage Public Consultation on the Draft Policy was held between the 3rd June, 2016 and the 22nd July, 2016. Eight submissions were received by the closing date of the last public consultation exercise and a summary with the Planning Directorate responses are included as Appendix 3 to this report.

1.5 This report documents the amendments affected by the Executive Council as per meeting dated 31st October 2016. A third stage Public Consultation is to be held on these amendments.

Figure 1: Site affected by the Partial Local Plan Review.



2.0 Proposed Revisions

2.1 The changes to Policy GM15 and Map 1 are as follows:

i) **The Land Use Framework**

At the end of the section insert a new paragraph to include:

Any redevelopment and/or extension of/on the existing development should require adherence to the indicated alignment and the establishment of 20% landscaping.

This seeks to ensure that all development sites contribute towards the provision of landscaped areas.

ii) **Building Heights**

Amend the last sentence of the second paragraph as follows:

Maximum building heights shall be measured above the highest level of any existing or planned access road bordering the perimeter of the individual block and shall include all levels of the buildings above this point. In the case of sloping ground or streets, adequate terracing and set-backs may be required to reduce the bulk of the building. No additional floorspace shall be allowed above this maximum height subject to the provisions of Section vii Utilities Services.

This seeks to encourage the provision of communal utility facilities and should be read in conjunction with the amended Section (vii) Utilities Services.

iv) Landscaping and Public Open Space

The first and second paragraphs should be amended as follows:

Development proposals on the sites allocated as landscaped areas as shown on Map 1, shall only include landscaping schemes in line with the relevant Guidelines on Trees, Shrubs and Plants for Planting & Landscaping in the Maltese Islands (2002) aimed at improving their green appearance through soft landscaping. In addition, an area of land of not less than 20 % of the gross developable footprint of sub-areas A, C (except the area to the north east already fully developed on separate small plots) and D, or part thereof, shall also be allocated for landscaped open space in any design scheme. A planting schedule and maintenance programme shall be a requirement for the assessment of development proposals and shall form part of the approved scheme.

In sub-areas C and D, a 6m setback is required from the alignment of Triq Aldo Moro and Triq tat-Tromba to allow for landscaping and/or improved vehicular access. ~~The areas allocated for landscaping may be deducted from the 20% landscaped area requirement above.~~

These amendments seek to encourage the increase in the provision of soft landscaping.

vii) Utilities Services

Amend the paragraph as follows:

Infrastructural utility requirements such as power supply, water supply, sewers (foul and storm-water, including reservoirs), and telecommunications should be addressed through consultation with the relevant utility providers and regulators. Services should preferably be located underground or in internal spaces within the buildings and if located at roof level, their

screening should be an integral part of the architectural design of the building, within the context of criteria (ii) and (iii) above, on Building Height and Appearance. Space for communal utility facilities provision will be offset in floorspace over and above the allowable height.

This seeks to encourage the provision of communal utility facilities

viii) **Planning Gain**

Delete the last sentence of the paragraph as indicated below:

The developer/s of sub-area A and B shall be legally obliged to cover the full expenses for the construction and maintenance of the ring road or service road, additional internal road links and the junction intersections with Marsa By-pass required by criterion (vi) on Transportation (access). ~~Additional contributions from all developers of the other sites may be required to other planning funds to be utilized in accordance with the rules and procedures governing the same funds and towards the provision of any necessary infrastructure upgrades.~~

The removal of these additional contributions has been offset by the requirement of the 20% landscaping.

Justification to Policy

The paragraph before last should be amended as follows:

The designated landscaped areas within the policy boundary are a distinguishing feature and their scale makes them amenable to adding soft landscaping ~~a green feel~~ to the area. It is important that they remain undeveloped and this policy seeks to retain them and encourage their enhancement. In addition, an area of land of not less than 20 % of the gross developable footprint in the sub-areas which have potential for major

redevelopment or part thereof shall be allocated for landscaped open space.

Appendix 1: Map 1

Correct the map key by transferring the 'colour box' pertaining to Zone A1 to the Section Sites A, A1 and D. This ensures full consistency between the policy and its map.

3.0 Strategic Guidance

- 3.1. This Partial Review is guided strategically by the ‘Strategic Plan for the Environment and Development (SPED)’ which highlighted in Para 1.27 the promotion of the socio-economic growth potential of key commercial sectors. The SPED identifies Marsa Park as a Business Hub with the aim of promoting the regeneration of the Marsa area which has experienced urban decay. The area has the potential for regeneration and the improvement of the general environment of the area. The anticipated commercial development serves as an impetus to improving the quality of the area.
- 3.2 Para 2.18 mentions the Marsa Park as an area for predominantly commercial development (offices/retail) related to market services and employment.
- 3.3 Furthermore, the following summarised SPED Policies are also relevant for this area namely:
- Policy UO 1.2 Designating the Grand Harbour Area as a strategic node for integrated regeneration.
 - Policy UO 1.5 Guiding the distribution of new jobs towards Business Hubs
 - Policy UO 1.6 Promoting the attractiveness of Business Hubs
 - Policy UO 3.4 Identifies sites that are of poor quality and seek their upgrading through high quality development
 - Policy TO 12.7 Ensures that the transport network serving the Harbour can accommodate their anticipated growth
- 3.4 The Marsa Park Development site was indicated as a Floor Area Ratio (FAR) area, as one of the locations designated as strategically appropriate for tall buildings as outlined in the ‘Planning Guide on the Use and Applicability of the Floor Area Ratio (FAR) (May 2014)’.

4.0 Amended Policy

4.1 Changes to Area Policy GM15

4.1.1 Amended Area Policy **GM 15 Marsa Park Development** now reads as follows:

Policy GM15 Marsa Park Development Area

The area indicated on Map 1 (amending the Marsa Map Figure 15 Marsa Inset Map) in the Grand Harbour Local Plan, 2011) is designated as the Marsa Park Development Area and Business Hub as identified by the SPED (2015) to enable the establishment of a sustainable, multi-use and resource efficient urban employment node, which shall create a quality business, enterprise and residential community making a significant contribution to the regeneration of the Inner Harbour Area.

Development proposals on the sub-areas A, A1, B, C and D, shown on the respective Marsa Map 1, shall be subject to the following criteria:

i. **The Land Use Framework**

Overall, the land uses may include any one, or a combination of the following primary functions:

On sub-areas A, A1 and D

- **Offices**
- **Retail**
- **Light Industry**

On sub-area B

- **Offices**
- **Retail**

- A mix of size and type of dwellings

On sub-area C

- Offices
- Retail
- General and Light Industry
- Storage and Distribution

Provided that in sub-areas C and D, development shall not have a direct frontage and vehicular access onto Triq Aldo Moro.

All sub-areas indicated above may include also a range of ancillary land uses such as food and drink outlets, assembly and leisure and child care facilities and other compatible uses. The distribution of floor spaces for both primary and ancillary land uses on individual sites should not compromise the objectives set out in the first paragraph of this policy.

Any redevelopment and/or extension of/on the existing development should require adherence to the indicated alignment and the establishment of 20% landscaping.

ii. **Building Height**

The maximum overall height of buildings within the five sub-areas shall not exceed 22 metres.

Maximum building heights shall be measured above the highest level of any existing or planned access road bordering the perimeter of the individual block and shall include all levels of the buildings above this point. In the case of sloping ground or streets, adequate terracing and set-backs may be required to reduce the bulk of the building. No additional floorspace shall be

allowed above this maximum height subject to the provisions of Section vii Utilities Services.

The allowable number of levels within the overall building height of 22m shall be interpreted in line with the provisions of Development Control Design Policy, Guidance and Standards, 2015.

The FAR mechanism can be applied to the site in line with the provisions of the 'Planning Guide on the Use and Applicability of the Floor Area Ratio (FAR) (May 2014).

iii. Appearance

Innovative design approaches which enhance the quality of the buildings and the spaces between them will be encouraged. Particular attention must be afforded to the design of the facades of the buildings on Triq Aldo Moro within sub-area C and D and the buildings of sub-area A onto Triq Dicembru Tlettax in view of the prominent visual location of these roads. The texture, colour and materials of the buildings shall contribute to the attractiveness of the appearance, character and image of the Marsa Park Development Area and its surroundings.

iv. Landscaping and Public Open Space

Development proposals on the sites allocated as landscaped areas as shown on Map 1, shall only include landscaping schemes in line with the relevant Guidelines on Trees, Shrubs and Plants for Planting & Landscaping in the Maltese Islands (2002) aimed at improving their green appearance through soft landscaping. In addition, an area of land of not less than 20 % of the gross developable footprint of sub-areas A, C (except the area to the north east already fully developed on separate small plots) and D, or part thereof, shall also be allocated for landscaped open space in any design scheme. A planting schedule and maintenance programme shall be a requirement for the

assessment of development proposals and shall form part of the approved scheme.

In sub-areas C and D, a 6m setback is required from the alignment of Triq Aldo Moro and Triq tat-Tromba to allow for landscaping and/or improved vehicular access.

v. Environmental Sustainability

Proposed buildings shall adopt environmental sustainability features including conservation of energy and water, design integrated renewable energy generation, measures to reduce trip generation and reduction of waste.

vi. Transportation

The development proposals shall be required to satisfy all of the technical and policy standards for junction capacities, parking, road safety and traffic circulation and may also be subject to a Traffic Impact Assessment (TIA), as necessary. The developer would also need to demonstrate that the public transport network has sufficient spare capacity to accommodate the anticipated additional growth in travel by public transport generated by the development. The assessment of other traffic related impacts such as noise, air quality and Greenhouse Gas (GHG) emissions may also be required.

The following additional criteria shall also apply:

- **Road Network:** Since this plan is based on the layout of the current road network, an area of land on the western flank of sub-area A shall be reserved for the upgrading of the road network. This area is indicatively shown on Map 1.
- **Access:** Adequate, safe vehicular and pedestrian access to and within the sub-areas should be provided to the satisfaction of all responsible entities. A peripheral ring road around sub-area A and a service road along part of sub-area B, both of a minimum width of 8m, shall be reserved for the safe intersection with the Marsa by-pass, through a single entry point and one exit

point for each respective ring road/service road. Apart from the provisions for sub-areas A and B above, no direct vehicular access shall be allowed on arterial and/or distributor roads;

- **Car Parking:** on-site car parking facilities for residents, employees and visitors shall be provided taking into account the established car-parking standards for the relative development type, the overall car parking provision in the surroundings (especially the availability of on-street parking, public car parks and/or park and ride facilities) and the provision of public transport. Payment in lieu of on-site car parking facilities may be considered provided the funds go towards addressing the transport impacts resulting from the development. Payment shall not be favourably considered in lieu of car parking required for any residential component of the scheme;
- **Green Modes:** design and construction of new roads shall be required to provide priority measures to improve the safety and attractiveness of these green modes.

vii. Utilities Services

Infrastructural utility requirements such as power supply, water supply, sewers (foul and storm-water, including reservoirs), and telecommunications should be addressed through consultation with the relevant utility providers and regulators. Services should preferably be located underground or in internal spaces within the buildings and if located at roof level, their screening should be an integral part of the architectural design of the building, within the context of criteria (ii) and (iii) above, on Building Height and Appearance. Space for communal utility facilities provision will be offset in floor space over and above the allowable height.

viii. Planning Gain

The developer/s of sub-area A and B shall be legally obliged to cover the full expenses for the construction and maintenance of the ring road or service road, additional internal road links and the junction intersections with Marsa By-pass required by criterion (vi) on Transportation (access).

The Marsa Park Development Area, with an area slightly larger than 10 ha, is not used efficiently, and significant amounts of land and buildings lie vacant or derelict awaiting regeneration. Although the predominant use is industrial in nature, other uses include a few shops and showrooms, small offices, residential and also horse stables and livestock farms. The high traffic volumes on the arterial and distributor road network and resulting associated impacts on noise and air quality are the other dominant characteristic of the area leading to urban decay.

The existing road network, Triq Diçembru 13 and Triq Aldo Moro along the southern perimeter and Triq it-Tigrija, Triq is-Salib tal-Marsa and Triq tat-Tromba along the northern and eastern perimeters, besides providing direct access to the land within the boundary of the Marsa Park Development Area as designated by this policy, subdivides the site into five separate parcels with independent access from each other A, A1, B, C and D. Some road junctions are currently poorly designed, direct accesses to properties can be a major traffic hazard and lack of on-site parking compels employees and visitors to park on the streets, often creating congestion.

The site is surrounded by mixed use areas with varying degrees of environmental quality. The north-western boundary faces a 1970s housing estate having reasonable residential amenity while the northern area on Triq it-Tigrija and Triq is-Salib tal-Marsa is dominated by industrial and warehousing development mixed with residential units, shops and a branch of a local bank. These uses are accommodated in a mix of one, two and three storey buildings dating from the earlier half of the twentieth century to more recent buildings from the 2000s. Parking problems and on-street un/loading activities are most acute on this stretch of road. The Open Centre for migrants is located on the eastern area beyond Triq tat-Tromba, separated from the Marsa Park by the hydrology/sanitary canal proposed for scheduling due to its historical importance. The southern perimeter has a more open character including the sports pitches at the Marsa Sports Complex and the golf course and outdoor sports facilities of the Marsa Sports and Country Club.

The environmental problems of the area generated by the heavy increase in traffic flows through the main traffic arteries combined with the incremental intensification of the incompatible mix of uses, insensitive interventions on the existing fabric and a degree of urban decline and abandonment make the need for a strong injection of investment more urgent. The potential of the site for development, mainly emerging from its strategic location and land supply, have long been recognized since the beginning of the 1990s. Previous policy direction, including the Grand Harbour Local Plan (2002), had provided the planning and development policy framework for this area but the implementation mechanism to take this framework forward was not put in place and required further considerations. This revised policy is intended to introduce more flexibility in the development of the Marsa Park Development Area but still guide future projects towards the provision of sustainable business developments within the Business hub. This policy seeks to ensure an adequate level of co-ordination between different proposals by dividing the site into five distinct sub-areas (A, A1, B, C and D), on the basic assumption that the alignments of the existing roads shall not be drastically changed but providing for road widening where this is essential for the efficient operation and servicing of the area through ring roads and service roads where required.

The range of acceptable uses has been guided by the core objectives of the Business hub as a primary development area and employment node, creating a location for a significant number of jobs supported by ancillary facilities and open space. There is a strong element of flexibility to the developer in the choice of scale and range of land uses which may eventually be developed on the separate sub-areas, especially the range of ancillary uses, but always within the overall development density parameters established in the policy.

The Marsa Park Development Area although located strategically and providing an important element in the availability of commercial hub space contains a number of limitations that need to be addressed. These limitations are mainly related to:

- a very complex and busy transport network and junction component that serves the north/central to south connectivity of the Island and includes the

major link to the Airport whose unhindered continued use is of paramount importance;

- an existing road and block layout that is highly compromised through existing permitted developments and multi-ownerships that do not permit major changes to the overall urban design of the area;
- the visually prominent streetscape of the Marsa Park area along Triq Dicembru 13 and Triq Aldo Moro and the evident lack of landscaped space and poor quality design of existing development in this area; and
- the need to balance out a mix of uses including an existing element of residential use.

These limitations are taken into account in the planning consideration of Marsa Park area and appropriate development heights, and site coverage are being established, whereby a building height of 22m (DC2015) is zoned with the possible application of the Floor Area Ratio. These development parameters have the potential to generate around 225,000 sqm of developable floorspace (GDF) within the whole of Marsa Park which implies a slight increase over the allocation in the 2002 Local Plan. These density levels are balanced with the provision of adequate open space (landscaping provision) to ascertain an overall sustainable quality of new development in view of the requirements of SPED Policies UO 3.3 and UO 3.6.

The designated landscaped areas within the policy boundary are a distinguishing feature and their scale makes them amenable to adding soft landscaping to the area. It is important that they remain undeveloped and this policy seeks to retain them and encourage their enhancement. In addition, an area of land of not less than 20 % of the gross developable footprint in the sub-areas which have potential for major redevelopment or part thereof shall be allocated for landscaped open space.

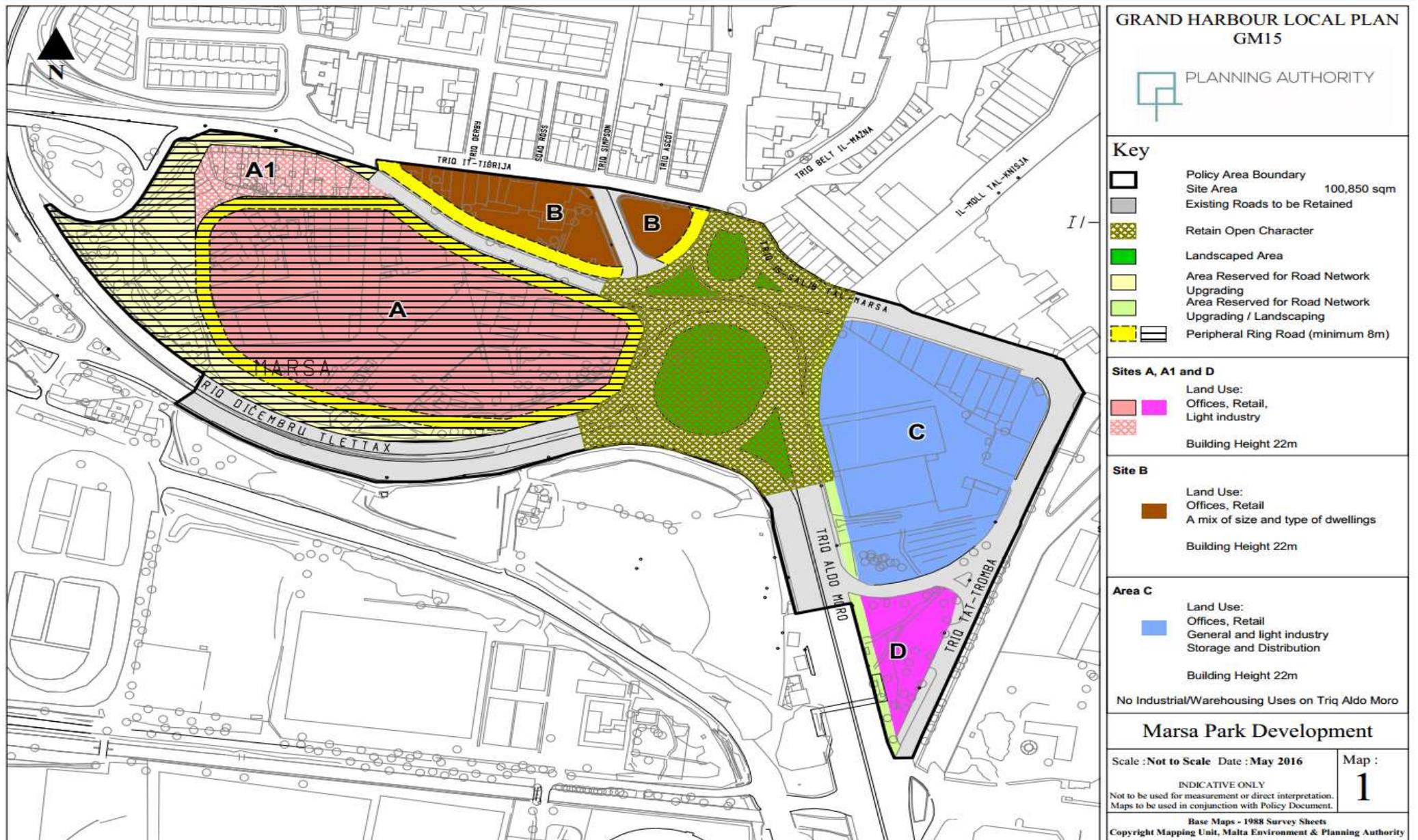
The provision of adequate infrastructure and car parking is vital to a successful development. The scale of these projects makes it even more fundamental, that the capacity of the existing networks to accommodate the increase in demand is determined as early as possible through the appropriate studies in the development

application planning stage with the responsible agencies and any shortfalls rectified. Transport Malta have already indicated that an area of land is required for the upgrading of the arterial road network and this has been integrated and reserved in the policy along with requirements for possible road widening in Areas C and D. Contributions from the developers towards infrastructure are also a requirement of the policy. However, contribution in-lieu of car parking is only being permitted provided the proposal does not include a residential component, to avoid situations where residents' vehicles are parked on the streets.

5.0 Conclusion

- 5.1 The Planning Directorate recommends the following Public Consultation draft for the Partial Grand Harbour Local Plan Review for the Marsa Park Area following the amendments by the Executive Council.

APPENDIX 1: Post Public Consultation Map 1



Grand Harbour Local Plan 2002 as amended in 2011 (Revisions 2015)

**Public Submissions on
Objectives for Partial Review**

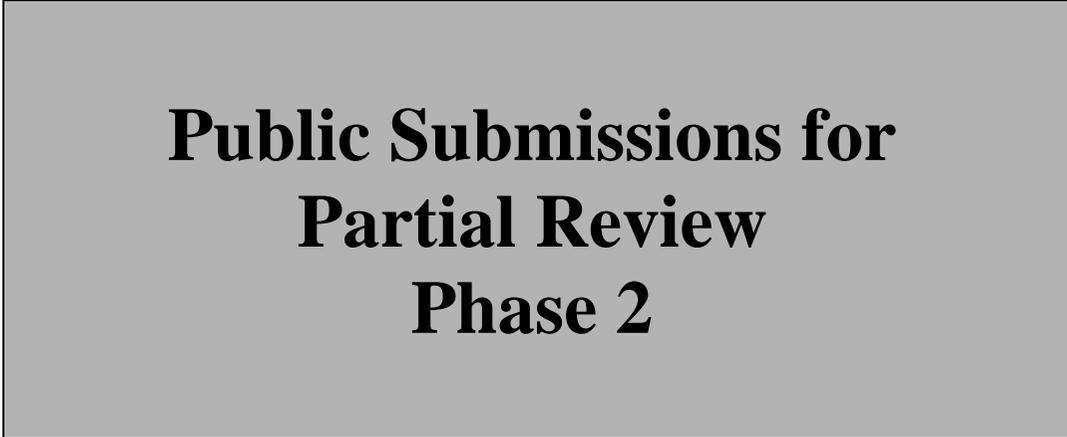
Ref	Respondent	Date	Summary of Comments Received	Response
GHMP/15 - Obj 1	Mr Kurt Grima Obo Bezzina Brothers Limited	22-7-15	<p>We have vested interest in the subject matter of the Partial Review of the Grand Harbour Local Plan (Marsa).</p> <p>Can you kindly send us further details and relevant documents for our perusal.</p> <p>May we also kindly ask you to extend, the date by a week within which our submissions, if any, are to be submitted</p>	The detailed policy will be issued for public consultation at a later stage.
GHMP/15 – Obj 2	Perit David Xuereb Obo George Pisani, Victor Bezzina, Salv. Bezzina & Sons Limited, Mr Angelo Xuereb, AX Holdings, Baron Gino Trapani Galea Feriol	22-7-15	<p>Industrial and warehousing uses are incompatible uses. Social uses should be allowed.</p> <p>Building heights should not be stipulated in policy but FAR principle should apply Built floorspace and volume should not be stipulated by policy but FAR principle should apply</p> <p>High quality landscaped open space should screen the development from the arterial road network</p> <p>A holistic approach for the Opportunity Area albeit ideal is not considered to be realistic and rational.</p>	The principle of retaining or otherwise the comprehensive approach, landscaping, respective land uses and building heights will feature in the revised policy for the area.
GHMP/15 – Obj 3	Perit Edwin Mintoff Obo Baron Trapani Galea, Lewis Camenzuli & Son Limited	22-7-15	<p>Different property owners are allowed to develop their property separately and are not be subject to any overall conditions or policies. This would ensure that the area can start to be redeveloped into a high quality development.</p> <p>The objective to realign the boundaries of the</p>	The principle of retaining or otherwise the comprehensive approach, landscaping, respective land uses and building heights will feature in the revised policy for the area.

			<p>areas covered by policies GM15 and GM 24 to allow for the consideration of alternatives for the alignment of Triq Dicembru 13”, does not change the property boundaries and frontages of the different land parcels of clients.</p> <p>Policy should allow for a more flexible development of the area. The existing policy limits the development of different land uses through defined maximum floor space for each land use.</p> <p>Client’s properties should be zoned for Retail and Offices land uses with supporting leisure and catering amenities, with a height designation of 9 floors.</p> <p>FAR policy should apply to the site.</p> <p>The transport interchange which was removed through the Partial Review of 2011 will not be reintroduced since park and ride facilities are already in operation in Marsa.</p>	
GHMP/15 – Obj 4	Perit Edwin Mintoff Obo J & M Property Limited	23-7-15	Site owned by clients should be included within the boundary where policy GM 15 applies. It should be zoned for retail and offices and supporting leisure and catering uses. It should have a building height of 9 floors.	Amendments to boundary followed in the 2011 Partial Review are being retained.
GHMP/15 – Obj 5	Perit Alexander Bezzina Obo Bezzina Brothers Limited	23-7-15	Bezzina factory premises command a strategic location in terms of display and showroom facilities. The proposed downgrading of Aldo Moro Road and the realignment of 13 th December Avenue will mean planning blight in terms of business. These are not really	<p>This issue is a transport related matter which is not the competence of the PA.</p> <p>The principle of retaining or otherwise the comprehensive approach, landscaping, respective land uses and building heights will</p>

			<p>required since the current road network copes well and only requires minor modifications.</p> <p>The land uses currently advocated with the possibility of other mixed uses should be retained/allowed by the new policy.</p> <p>Medium/high rise development should be allowed.</p> <p>Owners' site should be excluded from a comprehensive planning policy.</p>	<p>feature in the revised policy for the area.</p>
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APPENDIX 3: Public Consultation Submissions Phase 2

Grand Harbour Local Plan 2002 as amended in 2011 (Revisions 2015)



**Public Submissions for
Partial Review
Phase 2**

Ref	Respondent	Date	Summary of Comments Received	Response
MPPH2-001	Perit Charles Buhagiar, MED Design Associates Ltd.	09/06/2016	<p>MPPH2 – 001: “Whilst we have no comments to make to policy GM15 we would like to take this opportunity to request that:</p> <ol style="list-style-type: none"> 1. the boundaries of the local plan are extended to include the site located between Qormi Road and Triq it-Tigrija as shown in the attached site plan. I would like to draw your attention that the site is already permitted for development as per PC 15/09. According to this permit this site is zoned as a retirement complex, sports facilities as well as parking facilities. Thus policy GM01 is not applicable to this site. 2. we would like to request that the use of this site be changed to commercial use (large retail space over 500 square meters) and office space (Permitted uses 2a, 2c, 4a, 4c, 4d, 3c). 3. The building height limitation should be that as for the adjoining areas i.e. three floors plus semi basement measured from upper road level (Qormi Road). 4. The floor area ratio policy should be applicable to this site. 5. The alignment of the roads should permit road widening as may be requested by Transport Malta. 6. The site is subject to archaeological investigation prior to start of works.” <p>Marsa Park - Phase 2\MPPH 2-001_2.pdf – 4 maps</p>	The submission does not relate to the Marsa Park Development Area but to a site between Triq Hal Qormi and Triq it-Tigrija that is outside the boundary of the Marsa Park Development Area and therefore outside the scope of this partial review exercise.
MPPH2-002	Mr Sean Sciberras	17/07/2016	<p>MPPH2 – 002: “An additional part of Zone A should be left as buffer for a potential upgrade of the roundabout connecting Aldo Moro with Dicembru 13 especially in view of the Transport policy with is still being drafted.</p> <p>The proposed policy refers to the FAR policy but the result could be conflicts with rules stated in the two policies. There should be a sentence explaining how the requirements of the FAR policy supersede the requirements of this policy document when buildings are planned using the FAR policy. In particular I noticed the following: The minimum requirement of 20% seems to be in conflict with the 50%</p>	<p>Comment noted.</p> <p>The 20% requirement is over and above any requirements of the FAR policy.</p>

			<p>requirement of the FAR policy</p> <p>(vii) The Public Realm.</p> <p>5.12 Tall building schemes should create high quality, public space within the site and/or nearby through proper site layout and arrangements and through planning gain obligations towards the enhancement of the existing public realm and green spaces in the vicinity. The public space could take the form of both indoor and outdoor amenity space. The scale of open space should never be less than 50% of the site area and the amount of <u>public</u> open space required shall be determined on a site-specific basis depending on the current spatial provision, typology, disposition, usage and proximity within the locality. The development should promote consolidated outdoor public spaces that are safe, especially from crime, and attractive for all, and which meet the needs of both the users of the building and the wider neighbourhood. Public space should encourage people to linger and incorporate well-designed landscaping and street furniture – lighting, seating, litterbins, signage, public art, etc. - without creating clutter. The management and maintenance of these spaces needs to be specified in the planning gain obligation and agreed to by MEPA.</p> <p>The FAR policy is also clear on parking that high rises should cater for all their parking requirements. This policy should be that buildings built using FAR will have to cater for all the parking requirements in accordance with that policy”</p>	<p>Parking requirements are assessed in detail at the Development Planning Application stage. Moreover, Part (vi) Transportation of the proposed policy clearly defines parking requirements need to be met.</p>
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MPPH2-003	Mr Kurt Grima, Commercial Manager, Bezzina Bros. Ltd	20/07/2016	<p>MPPH2 – 003 “We refer to the subject in caption. Kindly note that our factory and office premises lies within this proposed local plan and as such we have a direct interest in this proposal.</p> <p>While we appreciate the recommended planning improvements to the local area, which improvements should enhance the overall environment and uses of the area, we have the following concerns which we would like to bring to your attention with a view to address such concerns from your end:</p> <p>1. It appears that the area being reserved for road network upgrading/landscaping encroaches directly on the area taken up by our existing showroom. Furthermore on page 9 of the partial review states <i>‘In sub-area C and D. a 6m setback is required from the alignment of Triq Aldo Moro and</i></p>	<p>The 6m setback is required for reasons of environmental improvement, network upgrading and/or for road safety. In case of redevelopment</p>
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		<p><i>Triq tat-Tromba to allow for landscaping/ or improved vehicular access'. You appreciate that latter mentioned areas carry the most commercial and market value and as such, these recommendations are unacceptable on our part.</i></p> <p>2. It is being stated that <i>'in sub-areas C and D development shall not have a direct frontage and vehicular access onto Triq Aldo Moro.'</i> We feel that this is very restrictive and in our opinion such a condition should not be imposed at this stage. Naturally any proposals regarding the above matter will need to be discussed and approved by your goodselves (PA).</p> <p>3. <i>Section viii. Planning Gain states 'Additional contributions from all developers of the other sites may be requires to other planning funds to be utilised ...'</i> We are of the opinion that the fees which are paid in connection with the issuance of development permits which include, payments towards infrastructure, roads, sewers etc. should cover the costs for any infrastructural upgrades for the area."</p>	<p>therefore there is a need to incorporate this setback in parts facing the Triq Aldo Moro arterial road. It is noted that this requirement is only being recommended on this side of the property only. It is also highlighted that the gross developable floorspace has not been reduced but increased by this Partial Review to promote higher quality development.</p> <p>A direct frontage and vehicular access onto Triq Aldo Moro would require a much wider setback for efficient access and safety similar to the commercial properties further south that operate onto a fully fledged service road.</p> <p>Comment noted. Amendment has been followed to this affect.</p>
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MPPH2-004	Perit Nicolette Micallef, QP Management obo Corinthia Holdings, Bezzina Group & AX Holdings	21/07/2016	<p>MPPH2 – 004: “FAR policy:</p> <ol style="list-style-type: none"> for the purpose of calculating the FAR, the site area shall include such areas allocated to the peripheral ring road (minimum 8m) and any such area that fall within the current confines of the existing land plot areas, prior to the endorsement of this Partial Review of the Grand Harbour Local Plan of 2002. according to the DC 2015, the maximum allowable height in metres with semi-basement is 22m for 4 floors (plus 1 recessed floor). The FAR policy 2014, section 4 definition of tall buildings quotes ‘...a building is considered tall if it is higher than 10 floors’ implying that the allowable maximum height should be of 25m which is five (5) floors (plus 1 recessed floor). In accordance with the designated location being strategically appropriate for tall buildings as outlined in the ‘Planning guide on the Use and Applicability of the Floor Area Ratio (FAR) (May 2014)’, we recommend consistency and hence maximum allowable height in meters with semi-basement for this site should be 25m. <p>Landscaping and Public Open Space:</p> <ol style="list-style-type: none"> The draft policy stipulates that an area of land of not less than 20% of the gross developable footprint of sub-area A, or part thereof, shall be allocated for landscaped open space in any design scheme. With reference to sub-area A, similar to sub-areas C and D, the peripheral ring road (minimum 8m) for buffer zones and/or improved vehicular access and any such area that falls within the current confines of the existing area prior to the endorsement of this Partial Review, should be deducted from the 20% landscaped area requirement.” 	<p>These aspects are addressed at the development application stage once an application contemplating the use of the FAR is submitted for redevelopment of site.</p> <p>The Local Plan allocates a building height limitation of 22m as a density and urban design measure and is not related to the definition of a tall building in the FAR policy.</p> <p>The 20% landscaped area requirement for sites C and D also apply.</p>
MPPH2-005	Dr Edwin Mintoff obo	21/07/2016	MPPH2 – 005: “I write on behalf of my client, Baron Trapani Galea, who is the owner of the property indicated in DRG 002. Public	The peripheral ring road is required for access to the new

	Gino Trapani Galea Feriol		<p>Consultation Draft Map 1 indicates that part of the client’s site within the development zone is being zoned as a Peripheral Ring Road. This consists of a considerable proportion of the site area and due to the big loss in the developable site area, it reduces the viability of the project considerably. The client does not exclude taking legal actions in order to receive some form of compensation for this loss.</p> <p>A compromise may be reached if an increase in the height limit is given as a compensation for the loss of developable footprint. This would also allow for the design of a landmark building at a prominent site of the Marsa Park development.”</p>	development and for safety. It is noted that the site may be more restricted than other sites and this is why 20% open space has not been requested for Sites A1 and B. It should be noted that the gross developable floorspace has been increased by this Partial Review to promote higher quality development and to regenerate the Marsa Park area
MPPH2-006	Dr Edwin Mintoff obo Trapani Galea Estates, Lewis Camenzuli & Son Ltd.	21/07/2016	<p>MPPH2 – 006 “Re: Partial Review of the Grand Harbour Local Plan of 2002 – Marsa Park Site (Policy GM15): Public Consultation Draft I write on behalf of my clients: Trapani Galea Estates; Lewis Camenzuli & Son Ltd who are the owners of the property indicated in DRG 001.</p> <p>It is being requested that the height limitation is revised to increase the development area in order to offset the area lost through the Peripheral Ring Road as well as the 20% landscaped open space requirement for Site A.”</p>	It is highlighted that the gross developable floorspace has been increased by this Partial Review to promote higher quality development and to regenerate the Marsa Park area Further concessions in respect of the peripheral road and the 20% open space requirements are not recommended as these are required to achieve an overall sustainable development of the area. Similarly changes to the height limitation from that set by the review are not recommended. It should be noted that the current local plan already requires the provision of landscaped areas and hence there has been no additional increase in requirements.

MPPH2-007	Ms Tara Cassar, Environment Officer obo Flimkien ghal Ambjent Ahjar	22/07/2016	<p>MPPH2 – 007: “FAA’s comments regarding: Marsa Park Site (Policy GM15) Public Consultation Draft- May 2016</p> <p>In order to ensure the sustainability, longevity and ultimately the appeal of the area to investors, the policy must create distinct green boundaries beyond the 20% landscaped open spaces listed in Amended Policy 4.1.1 (iv) ‘Landscaping and Public Open Spaces’. Actual <i>green</i> design would not just promote proven sustainable design methods but would actually set up a distinct infrastructural framework to ensure them. ‘Landscaped open space’ does not guarantee soft-landscaping and if uncontrolled will likely result in an increase of paved floor area, thereby reducing the site’s soil coverage without even providing a sufficient water catchment plan to ensure that the scarce resource of fresh water is not lost to overflow into the nearby sea - as has been the case in the past that only served to add to the bleak situation we are in today.</p> <p>Furthermore, the site’s proximity to Triq Aldo Moro entails that all efforts to reduce air pollution are put into place. This artillery road is the main connection between all North-South bound commutes, and forms part of the Ten-T Network. The introduction of a green belt (that would form part of a holistic vision of the site) would therefore not only benefit the health and quality of lives’ of residences and future employees, but would increase the appeal and competitiveness of the area to reputable business’s and therefore encourage the successful regeneration of the site.</p> <p>In article 2.4(b) the policy states as an objective “<i>to amend policy GM 15 Marsa Park Development to delete the requirement for the comprehensive development of the area as it is deemed to be the main stumbling block for the attraction of investment in the site.</i>” If it is believed that the comprehensive plan of 2011 deterred from the appeal</p>	<p>The 20% open space is being recommended to promote a higher quality development and so as not to create restricted developable areas especially in the smaller more restricted zones. Furthermore, the policy does not impede from the 20% or part thereof being planned as a green belt through design. Regarding the water catchment plan the policy requires that infrastructural utility requirements should be addressed through consultation with the relevant utility providers and regulators and any shortfalls rectified including water.</p> <p>The site is currently an air quality hotspot. The scope of the policy is to promote high quality development which in tandem with measures in the National Transport Strategy and the Air Quality Plan, lead to a considerable improvement in the air quality.</p> <p>The policy requiring comprehensive development has been in place since 2002 and this has not allowed for the materialisation of the creation</p>
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MPPH2-008	Ms Claire Cordina Borg, Senior Officer, National Affairs, ERA	22/07/2016	<p>1. General comments</p> <p>1.2 These comments are provided without prejudice to ERA's review at project stage when more detailed environmental assessment will be required. Depending on their nature and their scale, these proposals may also require different types of environmental assessments, including an Environmental Impact Assessments (EIA) screening procedure of projects in terms of the EIA Regulations, 2007 (S.L. 504.79).</p> <p>2. Environmental issues</p> <p>2.1 ERA's environmental concerns are as follows:</p> <ul style="list-style-type: none"> · The site in question is located at the periphery of the highly urbanised conurbation of Malta and opposite to the relatively low-lying Marsa sports grounds. The proposed height of 22m and the reduction of the 'Residential Area' to accommodate for 'Offices, Retail and Light industry' would result in further intensification of development in this area which is already subject to significant traffic flows and related congestion. Such development intensification could result in a substantial increase in vehicular traffic flows, thereby also increasing risks of traffic-related environmental impacts relating to pollution and pressures for further land take up to extend, upgrade or construct new infrastructure. 	<p>1.2 Comment noted. ERA is also consulted at project stage including for EA requirements depending on nature and scale of proposals.</p> <p>2.1 BHs are retained as for the existing adjacent commercial area in Marsa and as per approved DC2015. Regarding intensification, considering that the area is designated as a business hub by the SPED 2015, is strategically located and has been designated for development since the GHLP (2002) this constitutes planned development which has been in</p>

		<ul style="list-style-type: none"> · ERA notes that an area on Draft Map 1 is being proposed as an ‘Area Reserved for Road Network Upgrading’ as opposed to the current Local Plan designation ‘Peripheral Landscaping’. It is recommended that sufficient land should be allocated for public open green space in the immediate area, including proposals for the implementation of suitable soft landscaping, as a replacement for the loss of the current designated peripheral landscaping zone. This open space should remain accessible to the public and be maintained to ensure that the public continues to benefit from this space in the long-term. It is important to ensure that the provision of open green space and soft landscaping is effective and commensurate to the extent of development proposed at this site in order to reduce adverse impacts. In particular, ERA recommends that the creation of open green spaces should also seek to enhance and improve urban biodiversity in line with the National Environment Policy and the National Biodiversity Strategy and Action Plan. · Development should also have all necessary facilities in place for the storage and reuse of rainwater runoff as well as separate drainage systems for dealing with contaminated runoff (e.g. from car parks). · It should also be ensured that the drainage system and infrastructure 	<p>the pipeline since the 1990s. The current allocation for residential development is not deemed an appropriate land-use for the business hub.</p> <p>The policy boundaries are clearly defined and the upgrade in utilities needs to take place within these confines. Even if additional land was to be required, the context of the site is already urbanised.</p> <p>On ‘peripheral landscaping’ there is no reason why through appropriate design part of the 20% required open space cannot be planned as peripheral landscaping. Policy amended to reflect requirement for ‘soft landscaping’.</p> <p>The policy clearly states that requirements for infrastructure, open space, parking and utilities</p>
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