

PACEVILLE MALTA'S PRIME COASTAL LOCATION DEVELOPMENT FRAMEWORK

Public Consultation

Submissions by the *Kamra tal-Periti*

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K A M R A T A L - P E R I T I

To support members of the profession in achieving excellence in their practice of architecture and engineering in the interest of the community

This document has been prepared by an ad hoc Working Group (WG) established by the *Kamra tal-Periti* (KTP) to comment on the draft Development Framework Plan titled “Paceville – Malta’s Prime Location”, which was issued for public consultation by the Planning Authority (PA).

The contents of this report have been endorsed by the Council of the *Kamra tal-Periti*.

EXECUTIVE SUMMARY

1. Introduction and Premise

The preparation of a Vision for Paceville is in itself positive. Independently of whether one agrees with the content or approach, it is commendable that a draft Development Framework has been proposed which attempts to set out a strategy for growth and for the regeneration of the area, plans staged improvements over time, reflects a change in the way urban planning and development ought to be studied, and future planning undertaken. Indeed, similar initiatives ought to be more frequent and the mechanism should be encouraged for other areas, but under the umbrella of one strategic plan and vision for the nation as a whole, and not in an ad hoc and haphazard manner which raises more doubts than it proposes a clear vision that is of benefit to the whole of society.

The document is clearly presented by the authors as a Development Framework for Paceville. Attempts by the Planning Authority to present it as a Masterplan for the area, and as a Partial Review of the North Harbour Local Plan for the Paceville area are misleading and unacceptable, and undermine the Authority's role as a public agency to "*secure a balanced and sustainable environment.*"

2. Terms of Reference

The draft Development Framework fails to address the criteria established in the Terms of Reference (ToRs) provided to the consultants by the Planning Authority. Indeed, in certain instances, the Development Framework contradicts such Terms and goes well beyond the remit established in such Terms. Upon review of the compliance of the Development Framework with the Terms of Reference, one is left with the general impression that the nine strategic sites were pre-selected, and that the Development Framework process made no attempt to question or assess the suitability of these sites to achieve the goals of the Terms of Reference, nor was there any attempt to study whether other sites within the area could have been suitable to achieve such aims.

3. Conflicts with the Strategic Plan for the Environment and Development (SPED)

The Development Framework conflicts with the SPED in at least five aspects, thus making it irregular in view of the fact that all development and planning must be regulated and guided by the provisions of the SPED.

- a) It proposes a number of tall buildings in this locality, whereas the SPED expresses grave concern about the impact that such tall buildings pose to the Maltese landscape;
- b) It proposes a significant increase in the residential floorspace of the Area, whereas the SPED clearly establishes that the existing development areas amply cater for the projected demand;
- c) It proposes a significant increase in the commercial floorspace of the Area, whereas the SPED clearly states that current provision in the Local Plans amply caters for the projected demand;

- d) It proposes to adopt low parking provision standards for the nine selected sites only, and justifies this primarily on the basis of containing the costs to the developers, whereas the SPED clearly outlines the concern that not enough parking provision is being made, to the detriment of the quality of our town centres and with the result that congestion is exacerbated;
- e) It proposes a large land reclamation project, whereas the SPED stipulates that such projects should be carried out within a framework for the spatial planning of the Coastal Zone and the Marine Area, which framework has not yet been established.

4. Volume of Development

The volumes and population density proposed by the Framework have all the makings of a potential development bubble. The allocation of development volume is highly inequitable, and the justification for the proposal of so many tall buildings on the selected sites is based on the circular argument that these are requirement to accommodate the increased population, when in actual fact there is no justification for such increase in population in the Area, nor is there any justification for the projected increase to be primarily concentrated within these nine privileged sites. The lack of consideration for privately owned properties, which are proposed for expropriation for the provision of public space, while at the same time allocating significant development potential to public land which could easily be used for such purpose, further compounds the conviction that the Development Framework is not based on sound planning considerations and aspirations, but is intended solely to accommodate individual interests.

5. SEA Process and Local Plan Review

The Planning Authority has stated that the document will be submitted to the Strategic Environment Assessment (SEA) process, however this is not only premature but is also not in line with the process established at law for the SEA. Furthermore, the environment report which should be published together with any plan for review as part of the SEA process has not seen the light of day.

6. The Development Framework Document

While there appears to be consensus across the board that a Masterplan or Development Framework for Paceville is a step in the right direction, and while the proposal makes a number of important and commendable considerations, it also manifests a number of shortcomings which are primarily a result of the fact that the Framework is based on pre-established intentions, and there appears to have been little, if any, attempt to understand the problems, the assets, and the particular dynamics of the area with a view towards achieving a proposal which truly valorises those aspects which make Paceville unique and to build on these in order to achieve a sustainable growth of the area which is founded on sound social, economic and environmental considerations.

7. Infrastructure

The Development Framework includes a number of good proposals regarding the infrastructure required to support the proposed development. However these are proposed in isolation, rather than being presented within a National Infrastructure Framework. Furthermore, the significant capital outlay required to implement the proposed infrastructural changes appears to be unjustifiably concentrated in this locality to the detriment of other localities which are also crying out for upgrading of their supporting infrastructure. It would appear that Paceville is being singled out as more deserving of such significant investment by the Government, with no justification provided for this apparent preferential treatment. In addition, the proposed infrastructural projects appear to be based on dubious data, and do not adequately address the problems of the area.

8. Transport Strategies

The Sustainable Transport strategy appears to be flawed, because it only addresses transport within the plan area, and not to and from Paceville. The document does not, therefore, offer the *“coordinated approach to transport”* that is acknowledged as necessary. It is also unclear how the proposals within the document dovetail with the National Transport Strategy which has already been submitted for public consultation, and appears to have been proposed independently of such Strategy. At one stage in the report, the idea of a cable car is floated, apparently linking the main hotels, but this idea then disappears from view without much ado. The Development Framework does not cater for current operating establishments, whose owners have, inter alia, paid Commuted Parking Payment Scheme (CPPS) fees in lieu of parking provision, and proposes to reduce parking provision, including on-street parking, for existing establishments as a result of the pedestrianisation of streets fronting the said establishments. As long as viable alternatives are proposed, this could be a positive development, but the alternatives should not be a bias in favour of the parking facilities in the so-called strategic nine sites.

9. Considerations relating to tall buildings

The *Kamra tal-Periti* is not, ab initio, contrary to the development of tall buildings. It however cannot accept the absolute absence of any justification of either the volume, or the location, of such tall buildings. The assumption of the Development Framework is that a *“modern skyline and urban presence”* will help make Paceville an *“attractive, safe, efficient and environmental (sic) friendly place, where people live, work, play, and interact.....”*. Is it true that tall buildings help this? Is this the only way for these aspirations to be achieved? And what does this say about the rest of the island? Nevertheless, if the need for tall buildings were better justified, it would then be possible to address the recommendations made in the Framework Document. In addition, the document fails to address certain technical considerations such as shadowing, wind effects and foundation requirements in an adequate manner, and also paves the way for subjective interpretation of building heights by establishing these in terms of numbers of storeys rather than in terms of absolute heights in metres.

10. Environmental implications

The proposed development poses significant environmental concerns, in terms of sustainability, material resources and waste generation. The Development Framework document makes a rather weak pitch at addressing sustainability. Possibly this would fall within the remit of the impending SEA, and therefore at this stage it would be premature to comment further.

11. Financing, phasing and implementation

Considerations regarding financing, phasing and implementation of the Development Framework are essential, but are not sufficiently elaborated upon. The complete lack of cognisance of privately owned property within the plan Area, and the unavoidable cumbersome legal procedures that would be required in order to expropriate such property, raise serious doubts about the implementation timeframes of this proposal. A clear implementation plan, and the vehicle through which such will be achieved, is lacking. Otherwise, we run the risk of permitting individual developments, without the supporting infrastructure and amenities being in place, resulting in a failure to achieve the objectives of the plan.

12. Typographical errors and Format

The Framework document includes a number of typographical errors and diagrams at too low a resolution to be readable and which, for completeness sake, should be corrected. It is furthermore noted that the Terms of Reference required that *“the Development Plan shall be a written statement supported by such documents, maps of a suitable scale and diagrams of such quality as to clearly depict the intentions of the Plan and to enable communication of the contents to both professionals in the related development and planning fields and to the general public. Format of deliverables shall be in both digital and hard copy.”* The non-compliance of the delivered document to this requirement is unacceptable.

13. Concluding remarks

It is a pity that a laudable effort to *“see the bigger picture”* in a long-term perspective is diminished by a number of serious flaws. The focus on improvements in the public urban realm is absolutely correct. The extension of pedestrianised areas, and of shared surface treatment areas, is also a step in the right direction, even if more study is required to understand the impact on existing activities. The provision of open landscaped public spaces is laudable and the concept of preserving and valorising the heritage assets in the area is certainly a sound one.

However, the exercise seems to have degenerated into a justification of previously-determined development volumes, in previously determined locations. *“The quantum of development proposed at Paceville”* is accommodated but never challenged. Consequently, the *“iconic skyline”* is taken as an assumed *desiderata*. The urban design principles which are promoted in the document are of top quality, but the same principles seem to be contradicted by the scale of development proposed – which is never justified.

The Framework document is peppered with the right references to contemporary sustainable urban development principles. This is jargon found in textbooks on planning and urban design, but which mean nothing if not grounded in socio-economic and planning research. When one looks at the detailed proposals, one struggles to understand how such principles are actually put in place. There is reference to community facilities under the impressive heading of “*social sustainability*”, but nowhere is there any indication of what facilities would be provided. The document refers to “*preserving the inheritance of local traditions*” – what local traditions are referred to? How do the authors intend to “*preserve*” these traditions – with tall buildings, a massive change in urban fabric, a total shift of population, a new skyline?

The document suggests that social cohesion is a result of entrepreneurship and the tourism industry. This is highly debatable. Tourism is certainly not the best tool to foster social cohesion - on the contrary, it tends to erode community relationships, and hence social cohesion. In addition, development which emphasises social disparity does not strengthen cohesion.

There is repeated reference to highly political terms such as “*governance*”; what “*governance*” do the authors have in mind? How do they plan to enhance it – by preparing plans without even talking to the residents and users of the area? Yet another useless statement is the reference to “*healthy lifestyle choices*” and to “*education*”. Are they suggesting that existing residents and users of Paceville are not educated, and that they are not capable of making “*healthy lifestyle choices*” without the tall buildings being proposed? Is the vision one of a “*sanitised*” Paceville, where everything is “*beautiful*” and bright?

A promising document, focusing on the need to improve the public urban realm, is ruined by the lack of social research and the judgmental propositions.

There are other statements that do not stand up to scrutiny. How is it possible that tall buildings will have large roof areas over which we could use photo-voltaic panels – would this argument not be stronger if we promoted lower development? Statements such as “*retain and attract skilled and talented people*” are fine for marketing brochures, but do not have much value in a Development Framework document such as this is meant to be.

The failure to consult, in any way, with residents and economic operators of Paceville, is a serious defect. The authors report a “*number of site visits*”, but otherwise do not explain the methodology followed in the assessment of the situation, and hence in the formulation of proposals. There is nothing in the document which suggests that the rights of residents and locals to partake of the “*economic growth*” that will result from the proposed development will be safeguarded.

The Development Framework proposes extensive expropriation of private land and property – assets that many people’s lives, homes, business and investments have been built upon, on the basis of the current legal frameworks. The document becomes highly discriminatory, focusing primarily on business interests that are already public – whilst not considering possible future developments of a similar or smaller scale elsewhere.

It was a very good idea to prepare a Development Framework for Paceville. But once this decision was taken, would it not have been better to have a properly studied and more subtly nuanced one?

The following chapters expand on the points raised in the Executive Summary.

- 1. Introduction and Premise**
- 2. Terms of Reference**
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1. Introduction and Premise

The preparation of a Vision for Paceville is in itself positive. Independently of whether one agrees with the content or approach, it is commendable that a draft Development Framework has been proposed which attempts to set out a strategy for growth and for the regeneration of the area, plans staged improvements over time, reflects a change in the way urban planning and development ought to be studied, and future planning undertaken. Indeed, similar initiatives ought to be more frequent and the mechanism should be encouraged for other areas, but under the umbrella of one strategic plan and vision for the nation as a whole, and not in an ad hoc and haphazard manner which raises more doubts than it proposes a clear vision that is of benefit to the whole of society.

Plans should not, however, be conceived as static, but need to be fluid and dynamic, able to accommodate changes to the economic, social and environmental climate, and to cater for the unpredictable. That the authorities have understood that the drawing up of a comprehensive study is the best route to follow, remains nonetheless a good omen for the future. Nevertheless, it is important that the planning exercise undertaken provides the sufficient level of detail and analysis required, and is carried out in tandem with other serious national planning issues such as transport and infrastructural requirements.

It is also a positive step that the Planning Authority has out-sourced the drawing up of the plan to experts in the field, and the leap in quality, compared to existing Local Plans, is evident. However it is a pity that the choice was to go to foreign experts, rather than fostering local expertise in this field and providing it with an opportunity to develop. It is evident that the appointed experts were not provided with sufficient grounding in matters affecting the country, and there is an evident lack of knowledge of the area, awareness of the daily issues faced by communities, and knowledge of the aspirations of the population, both locally and on a national level.

The Development Framework proposes a number of positive approaches which should also be considered at a national level. The following list highlights some of these proposals that are considered to be positive and to merit commendation.

- 1) A focus on the public realm, and the ambition to create better public spaces, plazas and gardens, including:
 - pedestrianisation, partial pedestrianisation, and the recognition of the need to control traffic and on-street parking;
 - creation of more liveable public streets and spaces;
 - development centred around the provision of open public space, even when public space needs to be carved out of private land parcels.
- 2) Opening up the town centre to the coast, with better connectivity to the shoreline:
 - providing visual connections as well as physical ones;
 - promoting active use of the foreshore;

- helping break existing gated developments¹ which turn their back on the rest of the town and offer little to the public at large at times excluding it, at others offering an almost hostile front;
 - discouraging the creation of further similar exclusive communities.
- 3) The implementation of gateways as an improved approach to Paceville and the creation of a large piazza as the heart of the town.
- 4) To a certain extent, the document is insightful, in that it:
- tackles complex issues from diverse angles, and
 - incorporates proposals for infrastructure and development, for land use and for urban form.
- 5) Emphasis is placed on protection of views and sightlines, (even if only partially successful), and the desire to open up new ones. This helps in:
- improving the streetscape;
 - improving the psychological wellbeing and health aspects of the communities;
 - improving the town's legibility.
- 6) The call for multi-modal transport solutions is also positive, however the document stops far short of a comprehensive solution.

Having said this, the *Kamra tal-Periti* is concerned with the fact that the document is being widely promoted as a Masterplan for Paceville, when it actually is a Framework for Development, as presented by the authors themselves. A Masterplan, if well-drawn up, would contain significantly more detail at a much smaller scale, which would serve as a precursor for more detailed technical drawings leading to an implementation phase.

In addition to this, it is noted that the Planning Authority (PA) has presented this same document to the Parliamentary Standing Committee for the Environment and Development Planning as a Partial Review of the Local Plan for the Paceville area. However, the document has no semblance of what is expected of a Local Plan, both in terms of content and in terms of semantics, and therefore its submission to the legislative process is deemed to be highly premature. Attempts by the PA to pass it off as such are misleading, and undermine its role as a public agency to "secure a balanced and sustainable environment."²

Due to the lack of clarity as to the intended nature of this document, the KTP submits, as a preliminary premise, that it has reviewed the document as a Development Framework. In this light, therefore, it is necessary to first evaluate the objectives that the Framework proposes to achieve, and subsequently, whether delivers such objectives in a sufficient manner.

¹ Gated communities are considered by the Planning Authority to be a main concern afflicting the area, a result of, and a cause of, the low quality urban environment, anti-social behaviour, poor quality tourism accommodation and entertainment offer around them, the inhospitable streetscape plagued by congestion of vehicles and polluted air, making movement within and around the area, on foot or by public or private transport, considerably tiresome.)

² <http://www.pa.org.mt/organisation>

2. Terms of Reference

The Development Framework was commissioned on the basis of Terms of Reference (ToRs), prepared by the Planning Authority (PA). This particular 2-page document is rather dry. To a certain extent, however, it is complemented by the **Background Report: Paceville Business Hub, Urban Regeneration Priority Areas**, prepared by the PA in April 2016, in support of the proposed partial review of the North Harbour Local Plan (2006), as amended in 2010.

The ToRs define the area covered by the Development Framework. This is, in turn, derived from the Background Report, where it is proposed to designate this area as the **Paceville Business Hub Urban Regeneration Priority Area**. It is not clear how this area was identified as a regeneration priority area over other areas across the Maltese and Gozitan territory, and on what basis this area was selected as deserving of a Development Framework. It is also unclear how the boundaries of this area were selected, and, more specifically, why zones were excluded, which are not only contiguous but are, in effect, not really distinguishable from the rest in urban morphology terms. This applies especially to the areas to the south of the Area, where development occurs at the northern edge of Spinola Bay, and on the west of the site which is contiguous with Swieqi. It is also unfortunate that the Development Framework document does not make any reference to the impact that the proposed development within the selected Area will have, particularly on the immediately contiguous areas.

This is a serious defect in the Development Framework document, even if driven by the ToRs presented to the authors.

The ToRs envisaged that the Framework document would "**identify and designate sites with opportunities for development**" - and then propose detailed development policies for such areas.

In truth, the Development Framework does not *identify* any such areas; rather, it acknowledges as given the fact that nine "strategic" areas have been identified for the authors of the document by the PA. The document presents no explanation as to the basis on which these sites were selected, indicative of clear shortcomings by the PA in terms of democratic and market consideration. Such approach immediately raises the concern that this is a case of the tail wagging the dog.

The ToRs also required the preparation of a design strategy for tall buildings "**which promotes a quality business environment and enhanced liveability**"; in other words, the ToRs start from the *assumption* that tall buildings will promote a "*quality business environment*" as well as ensure "*enhanced liveability*". It is a significant weakness of the Development Framework document that it does not attempt to assess or challenge whether such objectives would be achieved by tall buildings.

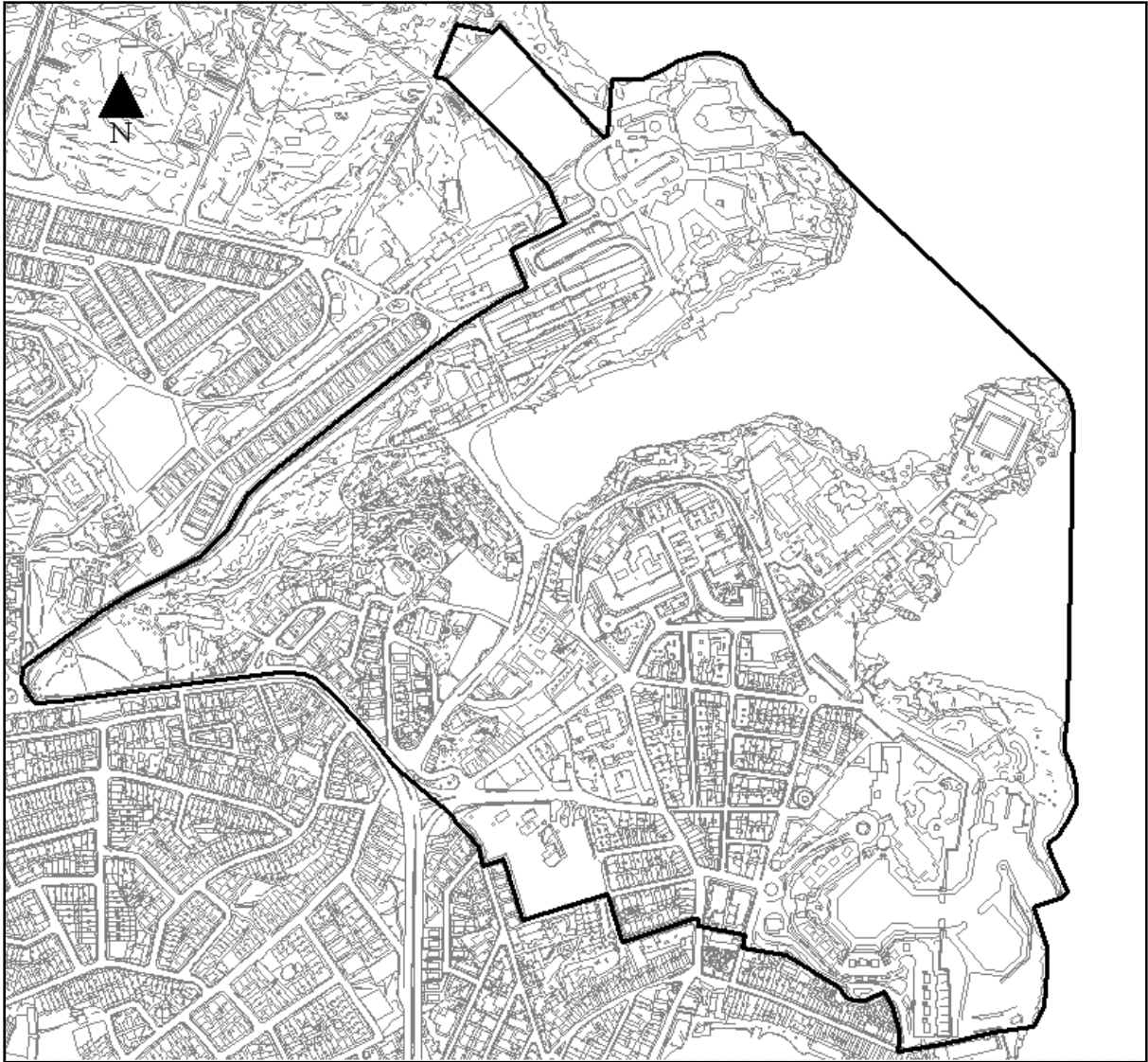
The ToRs make reference to the "*undesirable situation*" that has arisen following a "*rapid growth and deteriorating urban environment*", and invites the consultants to make proposals to "**meet the modern requirements of the tourist/leisure industry as well as the country's economic and social expectations**". One would have expected the Framework document to discuss what the authors understand are the modern requirements of the local tourist/leisure industry, or what they believe they ought to be; has any market research been undertaken to identify the requirements for the future hospitality/ residential/ commercial requirements of the Area? One would also have expected that such a Development Framework would have given more weight to social concerns and expectations as a priority over the requirements of the tourism and leisure industry. How have the country's social expectations been defined? How have the aspirations of the long-standing residents

of the Area been incorporated within the Development Framework, and how have their concerns been addressed? Without defining these requirements properly, the statements made in the ToRs remain empty words.

The Background Report identifies “**a low demand for residential units in Paceville**”; and yet the Development Framework envisages a resident population increase which is larger than that of many other towns on the islands. Is there any basis for this deviation from the indications of the Background Report?

The ToRs include a map that shows the boundaries of the study area commissioned to the consultants. The boundary on this map more or less coincides with that shown on a map prepared by the Government Property Department Estate Management Directorate, which makes reference to the “**Planning Authority’s Paceville Development Framework**”, with one notable (and suspicious) difference. The boundary of the study area has an incongruous bulge in the vicinity of the Portomaso site, which eventually becomes the site of a “*half-hearted*” land reclamation project in the Development Framework. The ToRs did not envisage an extension of the existing land mass, nor did it establish any justifications which would permit the authors to resort to such a proposal within the Area. In spite of this, the Framework document considers Site 6, which is outside the “*mainland*”, and therefore also outside any “*ownership boundaries*”, as one of the strategic sites. Almost all the maps in the draft Framework document clearly exclude this area from within the site boundary – which is rather contradictory. This reinforces the impression that the **Development Framework document is intended to justify development proposed at nine strategic sites, and not, as required by the same ToR, to identify which sites are suitable for development.**

Upon review of the compliance of the Development Framework with the Terms of Reference, one is left with the general impression that the nine strategic sites were pre-selected, and that the Development Framework process made no attempt to question or assess the suitability of these sites to achieve the goals of the Terms of Reference, nor was there any attempt to study whether other sites within the area could have been suitable to achieve such aims.



From: Terms of Reference for the preparation of a Development Plan for the Paceville Area

3. Conflicts with SPED

The KTP is of the opinion that the Development Framework document is in conflict with the **Strategic Plan for the Environment and Development** (SPED) approved by Parliament in July 2015, as follows:

a) Tall buildings

Part 2.42 of SPED, which was approved after the Floor Area Ratio (FAR) policy came into effect, states that: *“While tall buildings may increase the efficiency of land use if they are actually occupied and may contribute marginally to the provision of open space, their impact on the Maltese landscape is becoming a matter of concern. Between 2002 and 2007 12 tall/medium rise buildings all located within densely built up areas such as Tigne/St.Julian’s/Sliema were approved.”*

The SPED therefore highlights the concern of the State with the proliferation of tall buildings, and, in particular, with the feasibility of such projects if they remain unoccupied, thus marring the landscape for no real gain to the country or its economy.

It is therefore a serious failing of the Framework document not even to attempt to justify the need for a number of tall buildings on specific sites, which seem to have been identified solely on the basis of interest by the respective title holders/developers of the specific sites, and not on the basis of any serious study on the requirements for such tall buildings, or of their impacts on the market as well as social and environmental concerns.

b) Oversupply of land for housing

The SPED section on Land Supply issues (Parts 2.12 to 2.14) states the following:

“The Housing Topic Paper, 2002 estimated that to cater for projected growth in population and households and the demand for second homes, a total of 43,400 dwelling units would be required between 2000 and 2020. This equates to an additional 13,000 dwelling units for the SPED period (2014 - 2020). MEPA Land Availability studies indicate that in 2011, land available for housing development within the Development Zone, but excluding around 86 hectares of land allocated for residential development in the 2006 Rationalisation Exercise, amounts to 301 hectares. A conservative estimate of the capacity of the 301 hectares of land indicates that it can accommodate 37,000 dwelling units. With the 86 hectares of land allocated in 2006 this would bring the capacity to around 44,000 dwelling units... The total capacity of the Development Zone to accommodate new dwellings is indeed much larger ... Furthermore, during the period 2000-2012, 82,000 new units were permitted compared to a projected demand of 26,000 units over the same period whilst 41,200 dwellings lay vacant (including apartments rented to non-residents) in 2011 leading to the conclusion that there is an oversupply of land for housing. No comprehensive information is available that takes stock of the quality of these vacant dwellings and quantifiably describes the issues that prohibit them from being readily available on the market.”

The above analysis in the SPED clearly indicates that there is already an oversupply of land for housing at a national level. It is therefore unclear what basal studies have been used to justify the significant additional floorspace for residential use, being proposed for this locality. Surely, given that this goes directly against the provisions of the SPED, there should have been at least an attempt at justifying the proposed increase in residential floorspace, and the subsequent increase in population density.

c) Oversupply of land for employment

The SPED section on Employment (Parts 2.15 to 2.19) states the following:

“Forecasts for job creation up to 2020 are required to determine the amount of floor space needed to accommodate these jobs and ensure that the targets set out by the Government are met. An employment rate of 72.1% by 2020 has been identified in the Active Labour Market policy. The 2020 target employment rate is a proportion of the 20-64 age cohort (258,139) of the population for 2020 and this would result in a total employment of 186,118 persons. The projected net increase in persons in employment over the period 2013-2020 is estimated to be around 13,400 ... With an average employee to floorspace ratio of 1:50m² (MEPA data) the 10,370 additional persons in employment in the market services sector would require 518,500m² of floorspace. MEPA Land Availability Studies indicate that in 2011, floorspace available for development related to market services within the Development Zone designated in the Local Plans amounts to around 113,000m². In addition, Local Plans have identified other floorspace in areas such as Marsa Park, Gżira Employment Node, Fort St. Elmo, Pembroke and AirMalta owned land at Luqa for employment uses related to market services. Over and above, around 260,000m² of floorspace has already been granted permission for market service related development in Smart City and the Malta International Airport. Other opportunities exist on a number of strategic sites such as the ex Marsa Shipbuilding which has been earmarked for a Maritime Hub and the White Rocks area together with the regeneration potential of the Grand Harbour Area. Although the urban capacity of brownfield land within zones designated for employment uses has not been determined, the potential to allocate the additional floorspace is significant. Initiatives to encourage people to work from home and the increasing proportion of part time jobs shall also reduce the demand for floorspace in the future.”

This analysis in the SPED indicates that the area already allocated for offices and similar activities in the current Local Plans caters well enough for the projected working population over the SPED lifespan. It also identifies that requirement for floorspace in the future may well be reduced in view of flexibility in working conditions such as hot-desking, working from home, etc. Once again, therefore, the Development Framework fails to justify the significant increase in floorspace being allocated to office facilities and this in direct contrast and conflict with the SPED, which indicates that the demand can be well accommodated within already committed areas.

d) Parking requirements

Section 2.38 of the SPED states that:

“A further issue resulting from traffic growth is the increased demand for parking. Although provision increased over the past decade, it has not matched the higher increase in car ownership and use. This had deteriorating repercussions with a significant amount of town centre traffic being made up of cars searching for a parking space, the narrowing of roads by taking up space for further on-street parking ... This is particularly apparent in main employment and entertainment locations.”

It is therefore disconcerting, to say the least, that the policy PARK7 of the draft plan states that: *“An exercise was undertaken to understand what this would mean in terms of area for the sites based on 1 space per 40m² which is used for planning purposes for podium and basement parking. This has indicated that between 2 and 4 podium / basement levels would be required at each site which would represent a considerable investment for the developers. An exercise was undertaken to assess these parking standards against worldwide standards. This exercise indicates that the LOW standards are the most appropriate especially when considering that the preferred transport strategy is focused on reducing private vehicle usage through the control of*

parking. It is therefore recommended that the LOW parking standards are used in determining the number of car parking spaces and that these are made MAXIMUM parking standards in order that some control can be maintained and that an over provision of parking is restricted and hence traffic flows in the study area reduce.”

First and foremost, it is inconceivable that an important criterion, such as the parking standards to be applied in this locality, is motivated primarily by the cost to the individual developers. Secondly, even if one were to consider that a strategic approach to personal car ownership and transport modes at national level could result in a reduction for the requirement of parking provision, such national strategy has not yet seen the light of day, and therefore it would appear to be premature to apply lower parking standards at this stage.

Furthermore, one questions why Paceville is being given preferential treatment in this regard. Paceville is well known as a traffic-congested locality, and therefore it is not clear why it is being singled out as a locality where lower parking standards may be acceptable. Over and above, it is not at all clear why the nine strategic sites are being permitted to apply low parking standards, while all other developments in the Area will, presumably, be required to adhere to higher standards as per current policy. In addition, the above should be considered in the context of the proposed pedestrianisation of certain routes which will render existing carparks redundant, as discussed below.

This proposal of the Development Framework is therefore in conflict with the SPED which maintains that more parking provision is required in order to reduce congestion and deterioration of the quality of our town centres.

e) Land reclamation

Thematic Objective 1 of the SPED states the intention:

“To manage the available potential space and environmental resources on land and sea sustainably to ensure that socioeconomic development needs are met whilst protecting the environment and limiting land take up within the Rural Area by: ... Providing a framework for the spatial planning of the Coastal Zone and the Marine Area which supports land reclamation to further socio-economic development.”

The Framework for the spatial planning of the Coastal Zone and Marine Area, referred to in the SPED, has not been prepared, and therefore it seems premature for the plan to propose the inclusion of a significant land reclamation project in the plan area in the absence of such a framework.

4. Volume of Development

The Table reproduced below summarises the proposed Development schedule.

FUTURE LOCAL PLAN																
PARAMETER		EXISTING				ADDITIONAL					TOTAL					
		residential	total	office	other	total	residential	total	office	other	total	residential	total	office	other	total
GDF / FLOORSPACE (sqm)	Sites 1-9 Floorspace	149,014	198,111	29,071	56,308	432,505	261,365	231,029	218,467	31,805	743,214	432,505	429,140	347,539	88,112	1,175,719
	Sites 1-9 Land Use Mix %	34%	46%	7%	13%		35%	31%	29%	4%		33%	37%	21%	7%	
	Rest of Paceville*					352,495					160,826					513,321
	Paceville URPA masterplan					785,000					904,040					1,689,040
POPULATION (ppt)						residential	total	total	total	total						
	Sites 1-9					3,064	2,227	2,332	5,040							
	Rest of Paceville					748	509	662	941							
					existing population	additional population	additional employees									total population
	Sites 1-9					6,151	7,378									
Rest of Paceville					1,257	1,003										
Paceville URPA				1,939	7,448	8,581									9,587	

Paceville Summary Development Schedule (S2) Rest of Paceville total GDF assumed to have building volume 80% of gross GDF

Table showing summary development schedule (pg.105)

The implications of these proposed development floorspace with respect to the SPED document have already been outlined. One of the most important features of this additional floorspace is that the greater portion of it, by far, is concentrated in sites 1 to 9. Out of the 904,040m² total additional floorspace, 743,214m² is reserved to the nine strategic areas, in addition to the existing 432,505m² in these areas alone – this represents an increase of over 170%. The other areas, which currently accommodate 352,495m², are only allowed to increase development by 160,826m², an increase of less than 50%. The existing 1,939 residents are envisaged to increase to 9,387 – but two-thirds of these are to be accommodated in Sites 1-9.

The fact that the envisaged increase in gross floor area, and resultant high density, is limited to the nine strategic sites, is then used by the consultants as an argument to allow tall buildings on these sites. The “**quantum of development proposed at Paceville, coupled with the limited availability of land, means that many of the key development sites will need to contain tall buildings**”, (pg. 112). This is a circular argument.

If the Framework Document had fulfilled its Terms of Reference properly, and identified and, fully justified the identification of, the “*lucky*” sites where this volume of development would be allowed, it would then have been possible to defend this apparent unfairness in the “*developable future*” of Paceville. As things stand, this choice is not defensible. The “*strategic sites*” are strategic only because a number of developers have “*expressed interest*” in developing them. Surely, this is not a sound basis for a Development Framework.

A number of further observations arise from this consideration.

- i. If the volume of Development were justified, would it not be (a) more equitable, and (b) more conducive to an “*enhanced liveability*”, if instead of a limited number of tall buildings, there would be more, “*shorter*”, buildings. Such an approach, ideally coupled with measures to encourage land assembly, would also encourage regeneration of the whole of the Area, not just the sites in question. The argument that tall buildings would allow more public open space is a fallacious one.

This has been demonstrated in various land-use/density studies, but notably by the Centre for Land Use and Built Form Studies³. The Development Framework document proposes that, in order to create the right public open space in the right location, land which is currently privately-owned would be expropriated. And, in stark contrast to this, land which is currently publicly-owned is proposed as a strategic site for full development, to which the FAR principles are then applied - instead of simply *reserving publicly-owned land for landscaped open space irrespective of development potential*. The question of lack of equity is evident. It is amply clear, from the discussions before the Parliamentary Standing Committee, that the Development Framework was undertaken without any assessment of its impacts on private land, and that certain amenities which could have been easily sited on public land have instead been sited on private land.

- ii. If the volume of development were justified, and if the nine strategic sites could be shown to have been appropriately selected, to the benefit of some and the disbenefit of other land-owners in the area, could the extra-ordinary increase in value of such sites be more equitably distributed to the other sites? If only these sites were to benefit from the increased development potential, what incentive would there exist for the owners of other property in the area to invest, and maintain the desired high quality of the area? And would the glib statement that the proposed Framework would *enhance the land and property values* of surrounding sites be realised, or would it indeed have the opposite effect? And, further, if only these nine strategic sites were to benefit from this Framework, how would the state's investment in infrastructure, to the tune of several hundred million euros, be justified?
- iii. Finally, what would happen if, in one or more of the nine strategic sites, the developers decided to postpone development or fail to secure the necessary finance; would the development potential be lost, or would it be possible for developers in adjacent sites to benefit from the relative development possibility?

The Development Framework document does not provide sufficient justification for the projected growth in the area. Paceville's growth cannot be isolated from the rest of the Northern Harbour Region. The authors of the Framework document use the total Gross Development Floorspace (GDF) as provided by the PA, allegedly on the basis of the existing Local Plan allocations and maximum building heights applicable to the Area. Since these figures were given by the PA, the authors of the Framework document may arguably have been justified in using them, although professional responsibilities dictate that there should have been at least an attempt to question and assess the information provided, and to recognize the blatant disregard of planning principles. Nevertheless, in truth, this does not change the fact that (a) sites such as Site 1 – currently occupied by hotels, Site 2 – currently occupied by ITS, Site 3, and Site 6 – currently not even a land area, do **not** currently have a Local Plan allocation, or any maximum building height, associated with them; (b) even if this GDF really represented what is already provided for in the Local Plan, should not the figures be challenged; or, at least, should there not be some idea over what time-frame such allocation was to be utilised?

³ **Leslie, Martin Sir and Lionel, March.** *Urban Space and Structures*. Cambridge : Cambridge University Press, 1975.

There are other inconsistencies. If the office and hotel services population were going to increase so substantially, should not the volume of residential development – and the relative price range – reflect such increase, so that daily commuting to work could be discouraged? The population numbers listed in the document are not “*projected*” from the available statistics; they are based on calculations derived from the potential new development volume as obtained from the PA’s GDF. The Development Framework document consequently promotes a degree of speculation in assessing the demand for high-end development, at a time when the property market is growing too fast, and with property prices and rentals growing too quickly – all characteristics of a potential development bubble.

5. SEA Process and Local Plan Review

The Development Planning Act establishes the legal process by which a review of a Local Plan shall be carried out. This requires that the plan be issued for public consultation, and referred to the Parliamentary Standing Committee, which *“shall draw up a report within the consultation period ... and forward it to the Executive Council.”* If the Executive Council does not make changes to the draft, this would be forwarded to the Minister for endorsement; if changes were made, then a second round of consultation shall be undertaken. In either case, once the Minister agrees with the draft, s/he is to forward this to the Standing Committee for its scrutiny, and for it to submit its report to the House.

The Subsidiary Legislation which regulates Strategic Environmental Assessment (SEA), which the PA has confirmed as being required for the proposed plan, establishes the procedures to be adopted in such cases too. Amongst other requirements, the SEA *“shall be carried out during the preparation of a plan or programme and before its adoption or submission to the legislative procedure.”* It therefore seems premature that the Development Framework has been submitted to the assessment of the Standing Committee (i.e. the legislative procedure) when the SEA has not even yet been commissioned, as confirmed by the Executive Chairman of the PA during the Standing Committee sittings. Furthermore, as already elaborated on earlier, this is not a plan or programme as understood in the context of an SEA, but is merely a Development Framework which, as stated by the consultants during one of the Standing Committee meetings, is intended to provide an idea of what could happen in the area. This Framework, therefore, cannot and should not be submitted to the SEA process until a clear plan is established as a result of the current consultation process.

Furthermore, the SEA regulations state that *“an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated ... The draft plan or programme and the environmental report... shall be made available, by the responsible authority, to the authorities ..., the competent authority and the public.”* The regulations further require that the authorities and the public *“shall be given an early and effective opportunity within an adequate time-frame, to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme or its submission to the legislative procedure.”*

It is a fact that neither the environment report nor the SEA have been carried out, and therefore neither the public nor the authorities are in a position to review both together, as required by the above legislation.

6. The Development Framework Document

The Document has clearly stated goals, which include the promotion of *“Malta's prime coastal location”*, by implementing changes in the urban realm, and in transport and infrastructure. The expected outcome of the Framework is that the integrated development and transport Framework would act as a catalyst for regeneration of Paceville. The case studies used to illustrate the document are all urban improvement landscaping, and waterfront access improvement schemes, which were successfully implemented abroad – even without the additional development volume which is envisaged in the current proposals. Nonetheless, the Key Spatial Design Principles expounded in the document are all well founded.

It remains to be seen whether it is true that *“All the community's needs are met comprehensively”* by the proposed development (although there is no definition of who this ‘community’ consists of); whether *“new job opportunities for residents of Paceville and the surrounding areas”* will be generated, as claimed; and whether it is true that *“sustainable economic growth”*, in the true meaning of the term, would be promoted by this Framework document.

The following is an outline of some of the shortcomings of the Document:

The Shortcomings

- 1) The lack of consultation with the residents, users, and owners of the area, possibly a result of a fear of engaging with the public at an early stage of the process, is a sad characteristic of the local planning regime. As a result:
 - the public's resistance to accommodating change, especially on a large scale, is further increased;
 - proposals are viewed as impositions from above, not home grown nor grounded in the community's needs;
 - a lack of trust is engendered in the process and the motivations behind the scope;
 - the public anticipates little say over, and minimal influence to affect changes to, the plan even when it affects them directly, individually and collectively;
 - the document makes no mention of, nor reference to, any analysis of the desires and needs of the community, which is essential for any successful exercise of similar scope;
 - the document seems to ignore the interests of the residents and the existing working communities;
 - the plan is viewed as pre-determined, designed to provide the replies expected, and to accommodate the needs of those who commissioned it.

- 2) It is clear that no free hand has been given to the authors, with restrictions set in advance and pre-defined prospects dictated to them, so that, consequently:
 - no comprehensive and serious analysis or understanding of the real issues has been undertaken, nor of how the area should grow in a comprehensive manner, in the context of larger nationwide complexities;
 - the exercise is somewhat diminished, because it addresses only a known number of private development demands favoured by the authorities; and therefore it reads as a means of

making those demands palatable under the guise of a form of a controlling, even if undesirable and mistaken, policy framework;

- the exercise is focused not so much on Paceville as a whole, but on specific selected sites (development parcels), which the PA suggests require holistic development plans; the remaining built areas around them are given little mention or acknowledgement, seemingly undesirable inconveniences in the realisation of these major development proposals;
 - there are inconsistencies between the proposals and the objectives actually aimed for, both those set by the PA, as well as those formulated by the authors themselves such as:
 - a clear list of views that are to be safeguarded is given at the start, but the proposals do not accommodate them at all;
 - the view of Dragonara Palace from Sliema is hidden completely by the wrongly-sited and ill-conceived proposed Portomaso development on a new peninsula;
 - the view of the St George's Barracks from Cresta Quay has, through these proposals, been completely removed;
 - the proposal for tall developments right on the water's edge at Cresta Quay, or out at sea on the Portomaso's new peninsula, negates the attempt to step down development heights from the higher land parcels down to the coast (not to say anything of the legal obligation to reserve a 15m depth of foreshore clear of any development);
 - the stated intention to once again expose the St George's Tower is completely forgotten, and the tower is engulfed, unceremoniously, within a dense alien urban grid of large scale edifices.
- 3) The Framework Document is built on a misguided strategy which perhaps does not contemplate the bigger national picture, and the country's needs and conditions. As a result, the solution appears to be a complete revolution of what Paceville is today, and a negation of its role in society. Little analysis has been made of the real character of Paceville today, and its significance to the country's social and economic fabric. And although one statement lists the area's attractions (**Paceville's attractiveness, despite its shortcomings include the beach at St George's Bay, the coastline, the presence of high quality hotels, and the entertainment offer**), the vision set has a very strong chance of ruining these same qualities and strengths of the area;
- 4) The Brief acknowledges that: *"Today Paceville is an important tourism, commercial and economic zone, that caters for some of the most prestigious and important hotels in the Maltese islands. However, its rapid growth and deteriorating urban environment are impinging significantly on the overall experience of its residents and visitors alike."* Yet the Document ignores Paceville's far more important role as the nation's beating heart, its prime entertainment centre, sought after by locals and visitors. Perhaps as a result of this, the area also accommodates tourism on its outskirts, and commerce draws on the success of the entertainment offer.
- 5) The Development Framework document refers to the *"containment of entertainment sector to the centre of Paceville and St. George's Bay"*, a proposition which remains terribly vague, particularly on the way the enforcement of such *"containment"* would be carried out. The decision to almost eradicate the main strength (for whatever the nature and attractiveness of the offer, it is definitively a strength of Paceville, and one which sets it apart from all other towns,

villages and districts of Malta) of the area by promoting only high quality, exclusive, and seemingly gated large scale development parcels, is not only contrary to the goals of the strategy, but by driving the entertainment offer away from the area, will lead to the decline of Paceville's attractiveness, and its standing in the local cultural scene (for, like it or not, this is also part of local folklore and culture).

- 6) It is not clear what appeal a new centre for Paceville will have, with exclusive residential developments, aimed at an affluent and foreign, mostly non-resident market, surrounding high-end office towers, and an assortment of typical urban hotels in standard city blocks. What attractions will an entertainment-less Paceville offer, which other parts of Malta do not already provide? And if this is the type of high quality development that a studied vision for Malta's future suggests is required, on what basis was the decision taken that this should be based in Paceville?
- 7) The death of the entertainment industry in Paceville will not be due to the sudden decline in the community's appetite for the entertainment found there. What will happen to the entertainment offer when it is driven out? Which other location on the island will it migrate to, and what will happen then? Do we start the process again to disinfect the newly plagued areas (Marsascala?, Buġibba?, Gżira?, or Għadira?) from an infestation of clubs, discotheques, drinking holes and other activities which are attracted along with them.
- 8) It is nonetheless true that as a result of the lack of an overall vision, and a wholly inadequate licensing system, the local entertainment offering, and particularly the nightlife industry in Paceville, is characterised by piecemeal developments, and consequently unsafe and substandard nightlife areas, inept health and safety, and a conflictual relationship with residents. Unfortunately, the Development Framework document does nothing to resolve this long-term planning concern, but simply seems to wish to sweep it aside.
- 9) The initial premise therefore appears not to be so sound. Would it not be possible to animate a refurbished Paceville during the day, using a softer touch, encouraging, yes, alternative activities, and strengthening the community both in numbers, but also by providing them with additional facilities to encourage those current residents to stay, and attracting new residents to the area.
- 10) If the numbers were correct, Paceville's population would exceed that of St Julian's. Would it not then be correct to consider Paceville as a centre in its own right, with a daily market, a supermarket, a health centre and emergency clinic, a police station, schools, day care facilities, public toilets, a post office, an administrative centre with a public rooms for meetings, a theatre and, its own park and sports facilities close by. At the very least, these community facilities, (which have been demanded by residents for decades), should be planned for Paceville in symbiosis with the closest towns.
- 11) The regeneration and refurbishment of Paceville, and an increase in population, may be just as successful yet less disruptive to the community and existing commerce, trade and tourism, with a more considered approach. The attractiveness of the tourism offer in Paceville surely results from the standards and quality of the accommodation and service, the diversity of the offer (3, 4, 5-star), and the location of the higher-end premises on the coast with unobstructed views out

to sea, surrounded by open land and ample space for pool areas and in some cases surrounding grounds to stroll in, in all security and tranquility. Despite this, the three major 5-star hotel sites are promoted for intense (re-) development rather than being offered adequate protection, and incentives to reinforce their strengths to attract a more demanding tourism. The outcome may be the elimination of the very nature of the attractiveness of those same hotels which has proved to be an asset to the area, and of benefit to the country's tourism industry, and its replacement with a product of more urban global nature, with little to no local character and flavour.

- 12) The vision should be based on an understanding and appreciation of what makes Paceville today the success it is, and it should work with the positive aspects, build on them, reinforcing them, assist in their preservation, renovation and growth. The vision should use today's success as leverage to attract investments into the more run-down areas, accommodating growth in these areas too, as a means of generally upgrading the whole of the territory even that outside the managed zones.
- 13) The proposals for the accommodation of taller buildings (using the FAR) are based on an unreasoned acceptance of the idea that only the selected development parcels can accommodate tall buildings. No mention is made (or it is avoided?) of what may, or should, happen on sites outside those parcels, which, subject to certain conditions, whether existing or new, may and most probably should under the circumstances, also accommodate taller structures. How tall and where should they be to help consolidate the skyline envisaged? What bulk (horizontal dimension) should they have?
- 14) Traffic limitation, and the introduction of multi-modal transport solutions, is positive. It can only truly work as part of a national strategy which will, as requested in the Partial Review document, also consider options of transporting larger numbers of people not only from the adjacent junction with the Regional Road and the nearby park-and-ride facility, but over longer distances, to and from the airport, say, or to the port, and onwards in the other direction to the north, including Baħar iċ-Ċagħaq, St Paul's Bay, Mellieħa and Għadira.
- 15) Transport proposals are insufficient, because they do not fit into a nationwide multi-modal strategy, which is the only solution to overcome traffic issues found within Paceville and countrywide. The approach is once again an acceptance of a status quo that Paceville can only be reached by (even more) vehicles on the roads. The goal of the Framework Document was stated as a way to avoid this. But in reality the vision cannot consider these points, because the authors do not seem to have been informed of plans for national multi-modal transport means, and as a result the plan is perhaps too early to be truly useful in this sense.
- 16) Should it be necessary to proceed with the plan now, sufficient provisions should be provided to accommodate future requirements for multi-modal transport stops within and around the area, whether those transport modes are in the form of rail (elevated or underground) or road surface trams, or cable cars or ferries, and especially where these may affect the specified development parcels. A few existing roads may also need to be redesigned to accommodate surface rail, say, while space would be required for the stops of other means of mass transportation.

17) Paceville should not be seen in isolation.

- Paceville's relationship with its neighbouring suburbs needs to be reinforced. For a vibrant Paceville, its role should shift to become more of a community centre, and not solely an area of leisure and entertainment.
- For the vision to succeed, more attention needs to be paid to Paceville's connectivity to its neighbouring suburbs, in particular Swieqi, Pembroke, and St Julian's, but also Madliena and Ibraġġ.
- Paceville may become a vibrant urban centre for these communities, if connections were adequately provided for, retaining its entertainment offer, but building on it, bringing further activity to Paceville during the day to add to the night scene
- The gateway on the regional road junction and the new tunnel help improve connectivity to Swieqi, but much more is required to make this strategy successful, especially in links with Pembroke, and the connection with Spinola and The Gardens, of which little mention is made.

7. Infrastructure

Since this document is presented as both a partial review of the Local Plan and a Development Framework for the infrastructure of the area, it is clear that the proposed developments rely heavily on the implementation of the infrastructural proposals. The plan, however, does not establish clear time-frames or a phasing plan for the implementation of these infrastructural proposals. It seems clear that the increased floorspace envisaged by the proposals cannot be accommodated unless these infrastructural changes are implemented first. Government should therefore give a clear commitment as to the implementation programme for the proposed infrastructural changes, and should also be clear about how the development of the nine key sites will be permitted to take place within this implementation programme.

At same time as the additional development volume is outlined in the Development Framework document, the consultants highlight the fact that water supply on the islands is *“under severe pressure”*, which, they continue, *“could suggest a cap on development”*. This wise statement is then, sadly, forgotten for the rest of the document.

Consultation with the different utility service providers – apparently the only external consultations undertaken – has resulted in generic statements that the relative utility has the capacity to accommodate *“the proposed developments”*. But which developments do they refer to? Have any of the utility companies determined what the current maximum carrying capacity of the area is? And do these statements reconcile with the fact that WSC *“have commented that the existing foul drainage system is near capacity in some locations”*; or, with reference to electrical power carrying capacity, that the Paceville Distribution Centre is *“saturated”*?

The Framework Document calls for works estimated at €443 to €585million, (including €150 million in land appropriation costs) – however, the period over which this investment will be required is not clear. This is equivalent to over half the allocation of EU funds in the current 7 year period. It is therefore a major proposal. How can it be justified to spend €400-500 million on Paceville alone? What will the return be to the rest of the country? Who will benefit? Where are the economic justifications? A National Framework Plan is needed; and it has to be supported by data. This should certainly be more of a priority than a Development Framework merely for Paceville. .

Without going into a detailed critique of the infrastructural requirements, which would be beyond the scope of this document, the following are some high-level comments on the proposals regarding infrastructure.

Water Infrastructure

1. Storm water

- It is not useful to make generic references to SuDS (sustainable urban drainage), if, as is acknowledged by the Framework, (pg.105: *“infiltration may not be possible where the ground is hard rock”*), it cannot be relied on to work in the context of the specific geology of the area – unless, that is, it is studied before. The reason for this is that, if SuDS does not work, then rain water has to be harvested to mitigate flooding, and it is therefore necessary

to designate the appropriate resources. It is also not justified to state that it is “*unnecessary to install storm drainage across the entire network*” (pg.172), once there is no planned layout of the network.

- Ground water recharge so close to the sea is unlikely to augment the aquifer, and will most likely discharge to the sea in any case.
2. Potable water
- The Framework Document ignores completely the widespread use of local reverse osmosis by individual major developments, which skews all the Water Services Corporation (WSC) figures on the consumption of the locality.
 - Given the density of the proposed high rise development, it is essential that the WSC caters for a separate high pressure fire hydrant supply main to cater for the emergency services; this need is patently obvious yet totally absent from the Framework Document.
3. Foul Water
- The knock-on effect of the 5-fold increase in population on the downstream recipients in St. Julian’s, and then Sliema, and eventually Gżira, of the sewage from Paceville is only lightly discussed.
 - The detailed response regarding the uncertain condition of the sewerage network, requiring a CCTV inspection a priori, suggests some extensive renovation may be expected.

Waste

The issue of the piecemeal approach adopted is illustrated by the location of the Waste Transfer Station outside the Paceville Master Plan boundary, in Pembroke, (pg.175). If the solid waste from Paceville cannot be temporarily stored within its boundaries, this then sends a powerful message of bad neighbourliness.

The document makes reference to a number of interesting, (but uncosted), ideas, such as underground waste bins and collection, or vacuum collection systems. But, the bottom line of the Development Framework is that the waste will be collected in the conventional way, and then taken to a Waste Transfer Station *outside* Paceville! Dumping the problem elsewhere is not a very sustainable way of dealing with a real problem.

Tunnel issues

The Framework considers two tunnels – one on the Regional Road, another ‘Regional’ Tunnel. The second will entail a re-installation of many of the services, especially sewerage, but also storm water, and will provide an opportunity to lay down much new infrastructure. It will address much of the fears of the network condition. However it will be heavily disruptive and not popular, and one must seriously justify the effort by a cost-benefit analysis.

8. Transport Strategies

Traffic

The authors of the Framework document acknowledge that “*transport is key*”. They go on to state that “*without a coordinated approach to transport, the densification of Paceville will further stress these issues*” (pg.54). This is undoubtedly true. However, in this context, is densification justified at all? How could traffic be reduced by “*intensifying use*” of the site? Could not one also argue that a lower density of development could better help Paceville attain the desired standards of liveability and high quality urban environment?

The Sustainable Transport strategy appears to be flawed, because it only addresses transport within the site, and not to and from the site. Should a study leading to the promotion of a Business Hub not also address, *in detail*, access to and from Paceville; or is it being assumed that once people settle in Paceville they will not need to move to other parts of the islands for any activity whatsoever? The document does not, therefore, offer the “*coordinated approach to transport*” that is acknowledged as necessary. The sizing, routing and positioning of the proposed Regional Tunnel do not appear to have been fully studied.

The transportation strategy for access to Paceville does not even include the St.Julian’s area, with particular reference to Gate 3 at roundabout *Triq ir-Ross*, and the connection to a proposed public park-and-ride facility for the south area (*Tigulio area*), and Regional Road, via *Triq A. M. Borg/ Piazza Spinola*.

Apart from the tunnel at Paceville Junction EA12, the Framework document also proposes a tunnel (pg. 95) around Paceville (route San Wistin/ Dragunara/ Il-Knisja/ il-Ross/ San Ġorġ); the document, however, lacks clear consideration of basic design issues related to the site, to mean sea levels, to the connections to existing developments, to the use of existing car parks along the route, and as well as on the constructability, and diversions during construction, for such a major project, and therefore, cannot be seriously considered. A clearer explanation of the basis for the estimates included in the document could also allow a comparison with the costs as anticipated by Transport Malta in its original TEN-T plans for the area.

The cycle lane along Regional Road, as a way of resolving transport congestion pressures, is unfortunately a rather laughable one. Cycling could be a solution within Paceville, only if the place really became one where it was possible to live *and* work. Parking restraint within the Paceville site is promoted, and possibly rightly so; but what happens outside the area of interest?

The reference to water transport raises tantalising possibilities, but, some greater clarity about how this could work would have helped dispel the impression that this is more a sop to Cerebus, than a serious proposal.

The Development Framework document refers to an upgrade of the Regional Road junction which links Paceville to the arterial road network and therefore to the rest of Malta. The junction is part of the TEN-T Comprehensive Network (Nodes NA11-EA13) which Government has earmarked for upgrading, as part of the wider TEN-T strategy and commitments within the EU, so as to improve

the island's main road networks, and remove bottlenecks. This section of the Comprehensive Network is referred to as RD6 in the recently updated Transport Masterplan, in that it is envisaged for upgrade following five other sections prioritised for improvements, including the Kappara and the Addolorata junctions.

It is assumed that the authors of the Development Framework have discussed their proposals with Transport Malta in the context of the TEN-T objectives. The basis for the planned transportation strategy needs to be fleshed out; there is insufficient explanation of how the population numbers estimated for Paceville (in terms of growth in both the resident and working population) were evaluated and modeled vis-à-vis the TEN-T Section. Page 156 refers to an Appendix, but our conclusion is that the estimates in Appendix are based on an incorrect baseline of the current traffic flows, (with the current low car ownership of aging population / low occupancy of residential units foreign owners / low occupancy of 3-4 star hotels etc.), which will not reflect the target of the high-end property market. When UK TRICS Trip Generation Rates are applied, as is the norm in Malta, with the estimated approx. 2000 residential units, 2000 hotel bed accommodation, approx. 218,487m² offices and approx. 3000 employees, the trips generated from the proposed development Option 3 would be well above the total peak hour total trip generated at access points, indicated at 2000 vehicles in/out on page 156, (estimated at approx. 10000 vehicles in/out). This data should be reviewed by TM to confirm estimates for total peak hour total trip generated at access points, capacities of adjacent links and junctions (with particular reference to roundabout at Triq ir-Ross and link to junction at Piazza Spinola which are already operating over capacity) and by TEN-T in relation to capacities of planned junctions on regional road.

It is also remarked, on pg.263 of the Transport Masterplan, that the performance indicators do not take into consideration the traffic impact of the preferred development option for Paceville (as proposed in the Paceville Framework document). It is furthermore unclear how the increased density of the Paceville area will dovetail into the National Transport Strategy which is still currently being formulated and which has already been submitted for public consultation.

Reference is also made to the report "*Traffic Impact of Land-Use Proposal for Pembroke*", drafted in August 1997, in connection with proposals to increase the number of residential units to 1,350. The report concluded that proposal would have drastic effects on the road network, and that parts of the arterial road (which includes tunnels) would need to be widened.

In addition to the necessary integration of the Paceville Development Framework into the National Transport (macro) model, it is necessary for a micro-simulation (or micro-modeling) of the traffic in the area. There is reference to some analysis (Initial Cordon Capacity Test and Theoretical Traffic Generation), but the document also claims the need for further detailed assessment (pg.156). The implications of growth in the number of people and activity on the transport infrastructure (current and planned) should be at the basis of all development considerations, otherwise all attempts at planning transport infrastructures (which take time and resources to build) are undermined.

The modeling of the traffic generation and distribution should also be the basis for considerations on local air quality, since the two are closely related, and should also be a criterion for setting thresholds to development, below that which is healthy and safe.

The Development Framework document misses the opportunity to propose a stronger position on the use of public transport. With the envisaged increases in residential population and tourists, Paceville is set to be a major node in the nation's transport system. Surely there is more than can be proposed beyond the bus system. At one stage in the report, the idea of a cable car is floated, apparently linking the main hotels. The idea then disappears from view without much ado.

Pedestrianisation and Parking

The parking strategy seems rather contradictory, with parts calling for minimum standard parking provision to reduce car access to Paceville, whilst other parts of the report advocate additional parking to be provided in all developments, as public car parking. The proposal for a car park at the Westin Dragonara Area 5, on such a prime site, somehow does not convince that the owners of this prime site would accept this proposal, when the area could be better adopted for high-end hospitality, instead of the hotels proposed on Cresta Quay and south east of St. George's Bay development.

No details have been given as to how adequate flow to the revamped park-and-ride facility will be ensured, especially with reference to the considerable hike in traffic expected to this location. The Development Framework document does not include any analysis to determine how the extensive pedestrianisation, complemented with street furniture, will affect existing resorts, hotels and establishments located within these areas. Furthermore, the document does not discuss the existing parking facilities located within the pedestrian zones. This has particular relevance when considering people with impaired mobility and the elderly. Will these people retain the possibility to be driven to and from their residences, and will they have to pay for the right to park their cars?

It is felt that the Development Framework document does not cater for current operating establishments, whose owners have, inter alia, paid Commuted Parking Payment Scheme (CPPS) fees in lieu of parking provision. The Development Framework document appears to reduce parking provision, including on-street parking, for existing establishments as a result of the pedestrianisation of streets fronting the said establishments. As long as viable alternatives are proposed, this could be a positive development, but the alternatives should not be a bias in favour of the parking facilities in the so-called strategic nine sites. Furthermore, the Development Framework document does not allow any surplus of parking provision over the minimum requirement, within the projects identified for the strategic sites. It is not clear whether adequate studies have been carried out to verify that the proposed park-and-ride could adequately compensate for these reductions, without seriously damaging the areas neighbouring the same park-and-ride facility, and without creating serious congestion at the junctions leading to the parking facilities. At this stage the following queries will need to be addressed

- How will the park and ride facility, which does not even work as a facility for Paceville at the moment, be re-modelled to cater for the rise in parking demand created by the proposed volume of development?
- What studies have been carried out to discover the current parking availability within the park-and-ride car park, the potential provision and what development is required to reach

this potential?

- What is the cost to be attributed to such developments, and who would be funding the said infrastructures, in view of the fact that the proposed developments will only be required to provide for “low parking demand”, even though, for example, in contemporary offices the trend is for dense workstation distribution in open plan offices.
- Will the collected CPPS funds be utilized to cater for the shortfall in funding resulting from these parking requirements?

9. Considerations relating to tall buildings

The KTP is not, *ab initio*, contrary to the development of tall buildings. The comments made in the fore-going refer to the absolute absence of any justification of either the volume, or the location, of such tall buildings. The assumption, (pg.4), is that “*modern skyline and urban presence*” will help make Paceville an “*attractive, safe, efficient and environmental (sic) friendly place, where people live, work, play, and interact....*”. Is it true that tall buildings help this? Is this the only way for these aspirations to be achieved? And what does this say about the rest of the island? Nevertheless, if the need for tall buildings were better justified, it would then be possible to address the recommendations made in the Framework Document.

Skyline Strategy

The skyline strategy is in general commendable, with the maximum building heights being set away from the coast, and tapering off as the shore is approached; this should guarantee avoiding a repetition of what happened with the Sliema Tower Road, where the tallest buildings are at the coast and the inner Sliema core has limited, if any, direct sea views and adverse natural lighting.

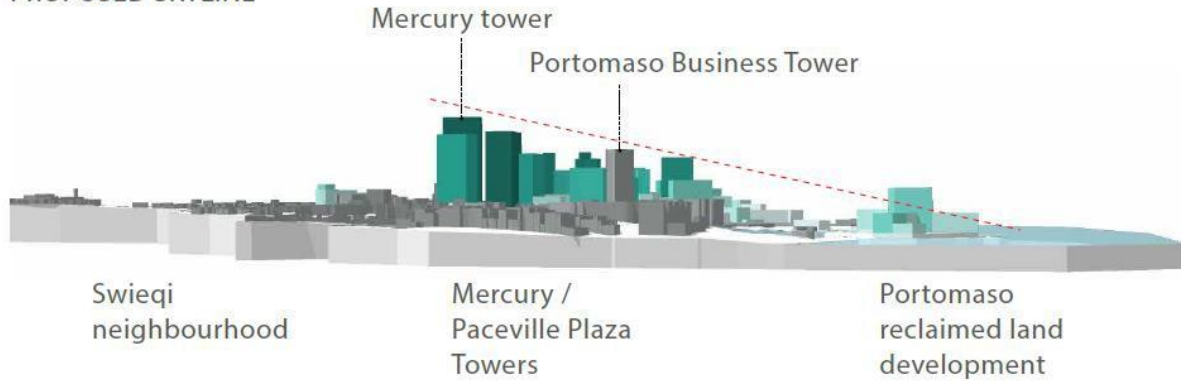
This skyline strategy is then contradicted by the inexplicable proposed location of a possible high-rise (up to 15 floors) at Site 6 (the Portomaso land reclamation site).

The document proposes the following (pg.220): *Due to the high visibility of the site (and the tall buildings strategy set out earlier in this report) a low rise development approach is preferred for this site. A high rise tower could, however, be acceptable. Such an approach would be highly visible from long distances and would provide a ‘light-house’ approach to the overall skyline of Paceville as seen from Valletta. This approach would, however, only be acceptable if the architectural treatment of the building was of the highest quality and helped provide a strong legacy for the area.*

The document itself recognises this apparent contradiction, but “half-heartedly” would allow a high-rise development if the proposed building is of highest quality, which by nature is a very subjective matter, and cannot be deemed to be a strong enough reference point in what will be a legislative framework such as a planning policy.

The red lines added to the images from the document, as shown below, indicate how including tall buildings in Site 6 violates the otherwise linear envelope of increasing building height from the coast to the peak at Site 7 (Mercury House).

PROPOSED SKYLINE



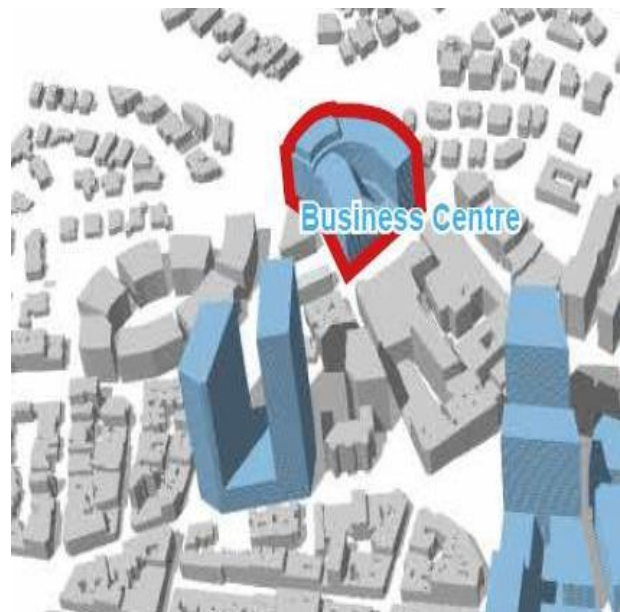
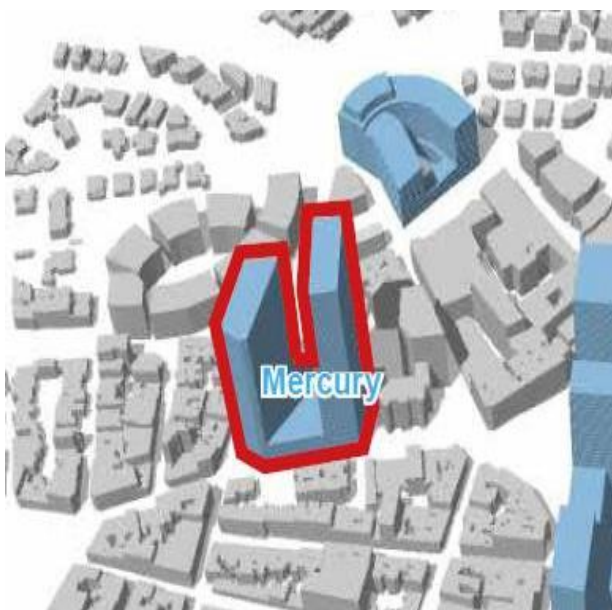
The document also seems to omit the fact that in the immediate vicinity of Sites 7-9, there are two medium to high-rise buildings (Pender Gardens) currently under construction, which ought to be included in the overall massing model to ensure proper assessment of factors such as overshadowing, wind effects, separation between buildings etc. This could have been an oversight, but should be included.

Site 7 (pg.222)

Sites 8, 9 (pg.224)

Building Heights

Building heights are currently being set in terms of floors (or storeys). This creates opportunities for abuse – on the basis of Annex 2 of DC15, this will certainly result in buildings being even higher than is being proposed. Different building uses (hotel, office, residential etc.) require different minimum floor-to-ceiling heights as well as different zone allocations for services, whilst floor-to-floor heights



are heavily influenced by the structural system adopted (e.g. flat slab versus beam-and-slab construction) and thus the height of a floor will potentially vary from development to development, and indeed even within different parts of the same development if this is a mixed-use one. Thus, rather

than in terms of numbers of floors, the building heights should be expressed in terms of an absolute height in metres above a datum which is not alterable as a result of development (e.g. current street levels) but a fixed elevation (e.g. mean sea level).



Building heights (pg.115)

Environmental Impact of Tall Buildings

Since the Paceville Development Framework Document is primarily about the erection of tall buildings, it was expected that the shadowing analyses would be better simulated, taking more consideration of the site contours. One would also have expected a more critical assessment of the shadowing simulation results. For example, on a late afternoon in September, practically all of the foreshore is in the shadow of the tall buildings. Undertaking shadow studies is useful only if alternative development configurations are compared and the least unfavourable identified.

It was also expected that some consideration were given to the effects of wind within the proposed pedestrian streets, piazzas, and neighbourhoods. Particular regard should have been taken in relation to the proposals on Mercury House and the road between Villa Rosa and St. George's Park developments. Severe shadowing along the coast, and on the natural landscapes, should also have taken into consideration the effect of the shade on natural habitats.

The consideration of “*sustainability*” is rather facile. Sustainability is not only about renewable energy generation; reserving public land from development today to allow development tomorrow is also a

sustainability consideration; as are considerations on resource use, social sustainability, risks arising from climate change.

Wind - pedestrian

The effect of wind on tall buildings is probably the most relevant subject which distinguishes these from low-rise buildings, both in terms of structural analysis and design, as well as the effects at street level (pedestrian wind comfort). The latter can significantly influence the appropriateness, or otherwise, of outdoor spaces for comfortable usage (e.g. open-air cafés, promenades, main pedestrian entrances to tall buildings themselves etc.), which is highly dependent on the microclimate around the base of tall buildings and influenced by proximity of tall buildings to each other, ground roughness and wind directionality.

Such studies rely heavily on either computation fluid dynamic (CFD) modelling, which can be computationally demanding if required to cover a site of great extents, or else by scaled wind tunnel models. These will allow a better understanding of the site overall master planning and possibly influence the heights of tall buildings and the distances between them.

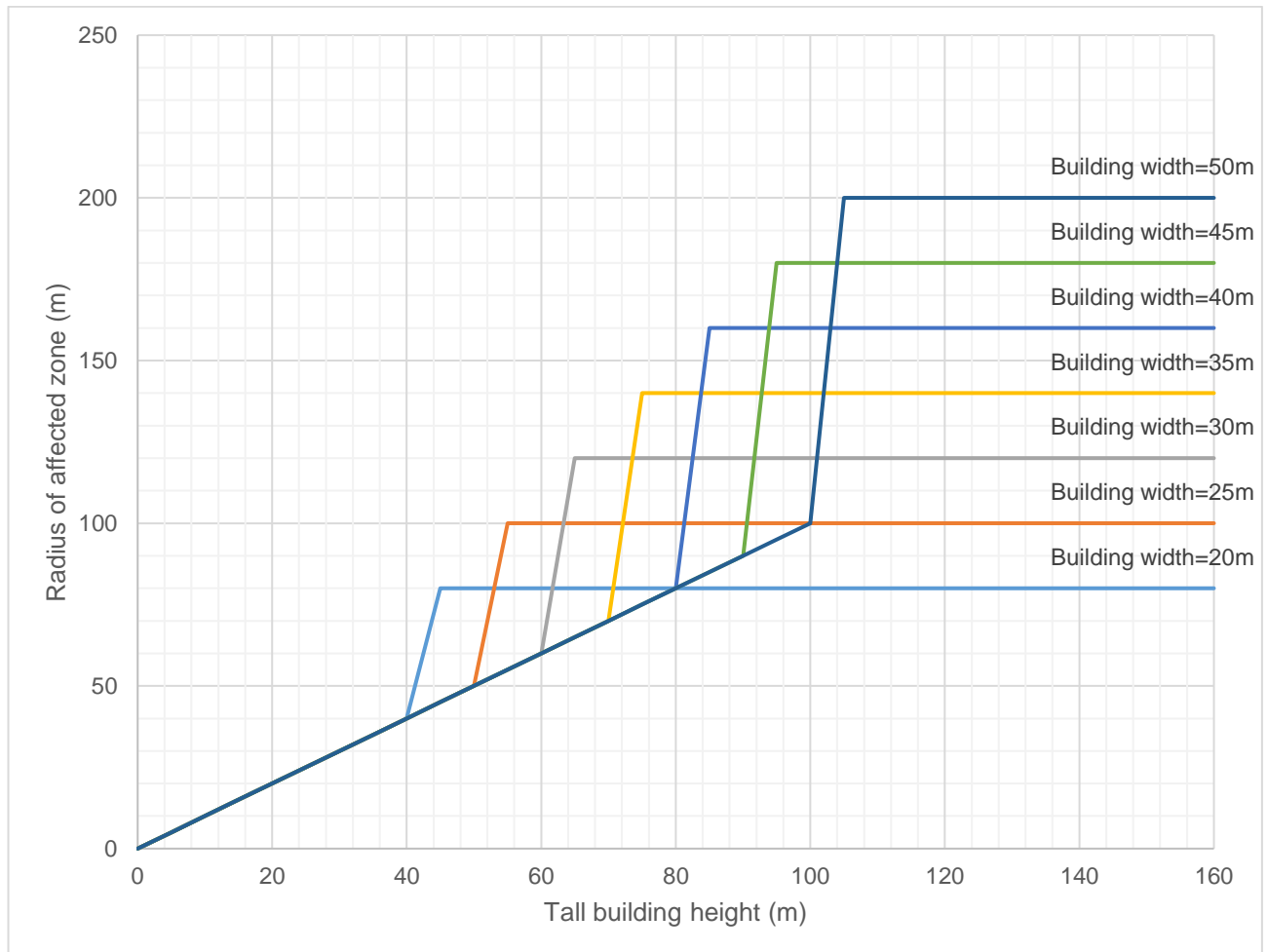
CFD and/or wind tunnel testing will also permit understanding the design and positioning of mitigation measures to maximise pedestrian comfort; CFD in particular is useful, since it is not limited by the practical limitations of scaling associated with wind tunnel models. For instance, 5mm pressure gauges in a 1:200 wind tunnel model need to be spaced at a spacing of some 50mm to permit installation and wiring in the actual model, which implies missing out an area of 10m at true scale, which is significant in the context of mitigation using wind obstacles such as trees, street furniture etc.

Wind - structural

In addition, perhaps the single most relevant difference between a low-rise and a high-rise building with regards to structural engineering is the response to wind loading. Wind velocity increases logarithmically with height, and subsequently wind pressure varies with the square of wind velocity. This could imply significant increases in lateral loading, which require careful analysis and design, compared with 'traditional' construction, where even compliance with 'rules of thumb' could guarantee structural safety and stability.

Whilst typically codes of practice can be used for buildings up to significant heights (e.g. EN 1991-1-4 is valid up to 200m heights), it is not unusual to pursue wind tunnel even for such heights; code loads can prove to be conservative for high buildings, but can also be unconservative in capturing the influence of neighbouring medium and high-rise buildings (e.g. funneling effects). In addition, the 'insertion' of tall buildings in an existing urban layout could have adverse implications on the resulting wind loading acting on the existing buildings; Appendix A of EN 1991-1-4 suggests that the area of influence could be up to a radius of the tall building's height (if the tall building is stocky) or a radius of the tall building's larger dimension (if the tall building is slender) – see figure below.

Low-rise buildings in these affected zones could then be subjected to wind pressures, which are equivalent to the wind pressure in a building with a height up to half these afore-mentioned radii; and thus a building which was designed to withstand a level of wind load adequately, might be subjected to an increase in wind load which renders it unsafe and/or unstable.



Underground Spaces

The Development Framework document should have also made a preliminary study of the existing subterranean spaces, both natural features (e.g. *Għar Ħarq Ħammiem*) and scheduled man-made underground volumes (e.g. the Cold War era underground chambers in the vicinity of Mercury House), so as to ensure their protection. The location of tall buildings, with the deep foundations they require, will most probably damage such spaces. The Framework Document should have taken adequate note of these issues, and formulated possible solutions.

10. Environmental implications

Material Resources

The Development Framework document makes a rather weak pitch at addressing sustainability. However, resource demand is not reduced by “*sustainable building techniques*” – whatever this statement means.

Based on the 743,214m² figure quoted earlier, and assuming reinforced concrete construction with an average reinforced concrete usage of 0.5m³/m², then the proposed projects will require some 371,607m³ of concrete. This has an embodied CO₂ content of approximately 152,358 tons (or equivalent to some 1,325 London-Malta flights with 250 passengers on board).

Assuming 360kg/m³ of cement, then this will require 133,779 tons of cement (or almost 45% of the annual cement use in Malta). This is excluding all other tall buildings (e.g. Townsquare, Gzira and Mrieħel sites) and ‘ordinary’ low-rise construction.

Assuming 100kg/m³ of reinforcement, these projects will require 37,161 tons of reinforcement.

Assuming a water-cement ratio of 0.5, then the concrete will require almost 67 million litres of water or almost 0.13% of the annual water production.

Finally, the aggregate required will amount to around 691,189 tons, or a fresh excavation of around 0.31m in all of Malta’s quarries (unless such aggregate will be imported in order to meet the higher concrete strengths typically required for walls, columns and foundations of high-rise buildings).

The PA should be addressing, and enforcing, sustainability merits of tall buildings, by encouraging optimisation of material use and pursuit of LEED and/or BREEAM accreditation of buildings.

The explicit inclusion of extensive land reclamation at Site 6 deserves a separate and wider study, which is beyond the scope of the masterplan specifically intended for Paceville and its urbanisation; there appears to be sufficient scope on existing landmass, without requiring creation of additional site area (refer to section 4 “Volume of Development” earlier), which makes the proposed land reclamation very questionable.

Excavation Volumes

A minimum reference to the generation of waste from demolition and especially from the extensive excavation envisaged would not have been out of place (refer to section 10.1 “Material Resources” earlier). Ought there not be at least an outline plan of how to deal with what will certainly be a significant volume of inert waste?

11. Financing, phasing and implementation

The Framework document does not address the existing private/ public land ownership, and includes proposals for development on areas owned by residents e.g. St. George's Park Residential area. It is not clear how compensation rights for inclusion of private property in the Development Framework.

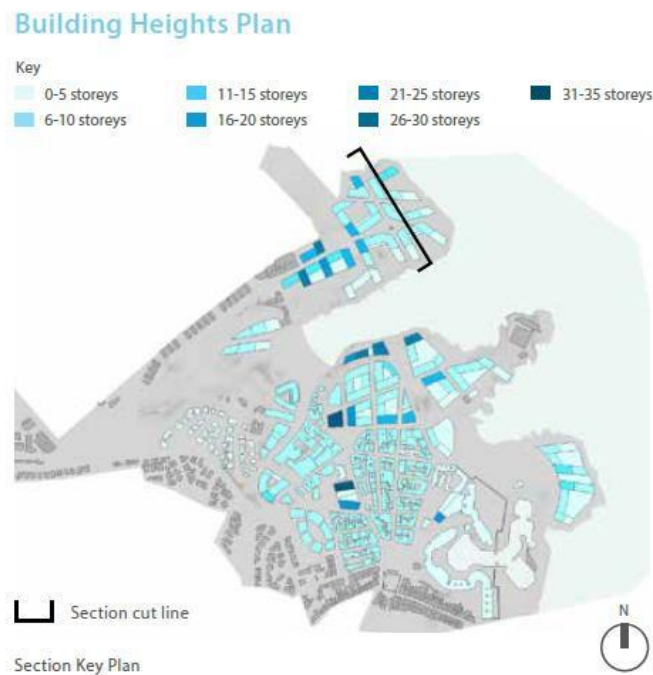
The Paceville Development Framework document should have been based on a better understanding of site ownership, and constraints should also have formed part of the presented document in order that it is established from first principles how land transfer is to take place, and how the rights enjoyed by the private sector are protected. A lack of understanding of such situations could result in either a temporary freeze until court procedures are settled, or a costly exercise to the nation in general whereby land would have to be acquired at substantial sums.

The Development Framework needs to address the financial aspects of the overall vision.

- It ought to make clear who will take ownership of the implementation of the Framework. A management and business plan is required, with anticipated cash flow projections, funding mechanisms, and, especially, clarity on the government's share of expenditure and revenue, etc. The long-term risks are enormous, and lack of funding, as seen elsewhere even in Malta would severely jeopardise the successful implementation of the plan.
- Government land should not be given away at below market rates, but at a rate considered to be favourable also to the country, with premia added to the cost for special licences for development (e.g. reclaimed land at sea, additional built volume and height). Consideration ought also be given to the concept of considering public land as a strategic resource, to be used only when private land is either insufficient, or when private enterprise cannot provide the facilities that are required for a viable community.
- The Development Framework hints at some form of public-private financing model, which can be developed to under-pin the investments envisaged. The document is, however, rather cautious – it only highlights the “likelihood” of public-private funding. In a development of this scale, financing mechanisms ought to be crystal clear before the country embarks on a route which is effectively one-way, with no space for detours. Alternative models of public-private ventures should also be studied.

12. Typographical errors and Format

The schematic key plans indicating where sections are cut shown at the bottom right corners of pgs.211, 213, 215, 217, 219, 221, 223 and 225 are all shown to be at the Site 1 (Corinthia) location; this is correct on pg.211, but incorrect for Sites 2-9. This is clearly a minor issue but, for completeness' sake, should be amended in the final policy document.



In addition, it needs stating that most maps in the document have a low resolution and the legends barely readable. This is as unfortunate as it is offensive. In this regard, it is noted that the ToRs conclude that: "The Development Plan shall be a written statement supported by such documents, maps of a suitable scale and diagrams of such quality as to clearly depict the intentions of the Plan and to enable communication of the contents to both professionals in the related development and planning fields and to the general public. Format of deliverables shall be in both digital and hard copy." The non-compliance of the delivered document to this requirement is unacceptable and must be remedied in any future revisions.

13. Concluding Remarks

It is a pity that a laudable effort to “*see the bigger picture*” in a long-term perspective is diminished by a number of serious flaws. The focus on improvements in the public urban realm is absolutely correct. For example, the idea of the coastal walk is indeed very attractive, (even if the idea had already been proposed in 1992 - vide Planning Authority, 1992, *Paceville Study, Executive Summary, Interim Report*, Valletta: Ministry for the Environment – and given up because of private ownership issues). It does not help if, in the same document, the proposed land reclamation in Site 6 is likely to close yet another very rare public (although already difficult), and shrinking, access to the sea. The extension of pedestrianised areas, and of shared surface treatment areas, is also a step in the right direction, even if more study is required to understand the impact on existing activities. The provision of open landscaped public spaces is laudable, but will Paceville Plaza be as big as suggested by the illustration on pg.131? And is it really expected that these open spaces will be embellished by the tall trees shown in the illustrations and by the grass beds? The concept of preserving and valorising the heritage assets in the area is certainly a sound one; but is it an appropriate approach for these buildings to be isolated, presented out of context?

The exercise seems to have, however, degenerated into a justification of previously-determined development volumes, in previously determined locations. “The quantum of development proposed at Paceville” is accommodated but never challenged. Consequently, the “iconic skyline” is taken as an assumed desiderata. The urban design principles which are promoted in the document are of top quality, but the same principles seem to be contradicted by the scale of development proposed – which is never justified.

The development options which are analysed and scored, are based solely on proposals submitted by, or discussed with, the Planning Authority. Is this a sufficient basis? Nine specific sites have been defined as “*strategic development sites*” - this begs the questions: Is it just the PA that has defined these sites as strategic? What and whose strategic objectives are served by development at these sites?

The “scoring” that is used to evaluate the three options is not really objective. In Option 1, for example, urban improvements are proposed, but the same volume of development at the nine strategic sites, including the land reclamation proposal, is assumed. Therefore, the three options are really about the differences between allowing the development and doing nothing else much, or allowing the development and improving internal transport links, and urban design improvements, etc. The comparison is rather a no-brainer, if couched in these terms. What about the option of implementing the urban realm improvement proposed and *not* adopting the high, and concentrated, volume of development envisaged in the document? Does Paceville really need “*new destinations*”?

The Framework document is peppered with the right references to contemporary sustainable urban development principles, particularly on pg.85, **Summary of Key Sustainability Issues**. This is jargon found in textbooks on planning and urban design, but which means nothing if not grounded in socio-economic and planning research. When one looks at the detailed proposals, one struggles to understand how such principles are actually put in place. For example, there is a reference to promotion of local food production – where and how will this happen? There is reference to the future of home-working; how does this relate to the proposal to provide more office space? And is home-

working really beneficial for the workers? There is reference to a “*purpose oriented, up-market, powerful and unique*” Paceville – what exactly does this mean? And how do the envisaged developments achieve this? There is reference to community facilities (pg.84) under the impressive heading of “*social sustainability*”, but nowhere is there any indication of what facilities would be provided. The document refers to “*preserving the inheritance of local traditions*” – what local traditions are referred to? How do the authors intend to “*preserve*” these traditions – with tall buildings, a massive change in urban fabric, a total shift of population, a new skyline? On which authority do the authors propose that providing Wi-Fi everywhere will promote social cohesion and social interaction in public spaces?

In the same page 84, the document suggests that social cohesion is the result of entrepreneurship and the tourism industry. This is highly debatable. Tourism is certainly not the best tool to foster social cohesion – on the contrary, it tends to erode community relationships, and hence social cohesion. In addition, development which emphasizes social disparity does not strengthen cohesion.

The references to greenery and foliage are, once again, glibly made, and do not give any thought to the realities of Malta and its climate. The proposition that the developments in Paceville can, in some way, “*preserve and enhance biodiversity*”, is yet again another glib statement. Another is the repeated reference to highly political terms such as “*governance*”; what “*governance*” do the authors have in mind? How do they plan to enhance it – by preparing plans without even talking to the residents and users of the area? Yet another useless statement is the reference to “*healthy lifestyle choices*” and to “*education*”. Are they suggesting that existing residents and users of Paceville are not educated, and that they are not capable of making “*healthy lifestyle choices*” without the tall buildings being proposed? Is the vision one of a “*sanitised*” Paceville, where everything is “*beautiful*” and bright?

A promising document, focusing on the need to improve the public urban realm, is ruined by the lack of social research and the judgmental propositions.

There are other glib statements that do not stand up to scrutiny. How is it possible that tall buildings will have large roof areas over which we could use photo-voltaic panels – would this argument not be stronger if we promoted lower development? Statements such as “*retain and attract skilled and talented people*” are fine for marketing brochures, but do not have much value in a Development Framework document such as this is meant to be.

The failure to consult, in any way, with residents and economic operators of Paceville, is a serious defect. The authors report a “*number of site visits*”, but otherwise do not explain the methodology followed in the assessment of the situation, and hence in the formulation of proposals. The document seems to assume that residents live on the outskirts of Paceville, whilst, in reality, many residents inhabit the core of Paceville. There is nothing in the document which suggests that the rights of residents and locals to partake of the “*economic growth*” that will result from the proposed development will be safeguarded. The document does not even acknowledge that the rocky beach between Portomaso and Dragonara is the only access that existing residents have to the sea, which is not completely taken over by entrepreneurs; this is the beach of the residents – and as shown in the shadowing analysis, it will be completely over-shadowed at critical times in the year.

The authors seem unaware of the fact that many of the old residents of Paceville are not homeowners, but rent their residences. This makes their residences more likely to be expropriated. The Development Framework thus becomes a plan to benefit the homeowners to the detriment of those who rent – this increases social inequalities and destroys the remnants of social cohesion.

The Development Framework proposes extensive expropriation of private land and property – assets that many people’s lives, homes, business and investments have been built upon, on the basis of the current legal frameworks. The document becomes highly discriminatory, focusing primarily on business interests that are already public – whilst not considering possible future developments of a similar or smaller scale elsewhere.

The document fails to make the distinction in character between the “city-like” Paceville area and its “suburbs”, Swieqi, the area up Lourdes Lane, etc., (which are smaller in scale and of a very different quiet nature). At the moment, they all just seem to merge with the new Paceville area.

It was a very good idea to prepare a Development Framework for Paceville. But once this decision was taken, would it not have been better to have a properly studied and more subtly nuanced one?

END