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Kamra tal-Periti

Commuted Parking Payment Scheme amendments



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

The Planning Authority has announced radical changes in the Commuted Parking Payment Scheme (CPPS), yet again without consultation with anybody. By means of PA Circular 2/18, published on 30th May, the Planning Authority announced changes, applicable as from 1st June – that is with less than two days' notice! These changes envisage that the amount payable to the Planning Authority, for each car space below the minimum car-parking standards (prescribed by the Planning Authority itself), increases from €1,164.89 or €2,096.44 (depending on locality) to €2,500 for each of the first two car spaces, €6,000 for each of between 3 and 9 car spaces, and to €9,000 for each of 10 or more car spaces below this minimum standard. The *Kamra tal-Periti* condemns the behaviour of the Planning Authority, which is arrogant enough to triple, quadruple and quintuple its revenue generating mechanisms, without deigning to even consult anybody in the industry, and without giving a decent notice to the principal actors in the industry. The Planning Authority unnecessarily created a situation where panicked developers pressured *periti* to submit planning applications by midnight of 31st May, jamming the PA's servers as a result.

Apart from the way this change was introduced, the *Kamra tal-Periti* has strong reservations about a scheme which is disguised as planning policy intended to help alleviate traffic problems, but which is nothing more than a crude revenue-generating mechanism. After 20 years of the CPPS, does the Planning Authority have any evidence that the policy has actually helped alleviate traffic? Twenty years ago, planning thinking in Malta was that it was necessary for proposed developments to accommodate parking for private vehicles that, it was estimated, would be generated by the proposed development. This type of flawed thinking has already been abandoned in most industrialized countries.

The provision of more parking encourages the use of private vehicles as opposed to public transport, and therefore it promotes road traffic congestion; research has shown that parking provision can actually be a disincentive against public transport, especially if it were free for the users of the building. The Planning Authority should have first studied whether, rather than promoting minimum parking provision standards, it ought to establish maximum standards of affiliated parking facilities. It could also have studied how many of garages in new developments are actually being sold to buyers of apartments, rather than left vacant, and hence not contributing to the envisaged alleviation of traffic congestion.

The extraordinary increase in CPPS fees will not reduce private vehicular traffic, neither will it promote green transport practices. It will certainly encourage developers to construct ever larger under-ground car-parking facilities, involving deeper excavations, more generation of waste, and more consumption of energy to maintain adequate environmental conditions in these facilities.

Twenty years since the introduction of the CPPS, it can now be confirmed that it is a failed planning policy, as not only does it not address parking shortfall problems but is the main contributor to traffic generation, air quality deterioration, degradation of quality of life through noise and dust pollution, and a major cause of inert waste generation that ends in our country's landfills with adverse impacts on our countryside.

The *Kamra tal-Periti* calls on the Planning Authority to reverse the proposed changes to its CPPS policy, and to undertake a proper study on the impact of such schemes on traffic patterns and use of public transport. The *Kamra* insists that planning is too important to be left solely to the Planning Authority;

The Kamra tal-Periti is affiliated to the International Union of Architects (UIA), the Architects' Council of Europe (ACE), the Commonwealth Architects' Association (CAA), the Union of Mediterranean Architects (UMAR), the European Council of Civil Engineers (ECCE) and European Forum for Architectural Policies (EFAP).



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consultation with other actors in the industry would be beneficial to Malta, indeed it is essential. Rather than glibly referring to green travel interventions, the Planning Authority is urged to embrace the real meaning of sustainable transport policy making. The Planning Authority needs to radically review its current planning paradigms and policies, and learn from international best practice in this field to provide a more holistic and comprehensive planning system, which integrates public transport in new development schemes, and uses planning gain as a measure to subsidise public transport, and promote a much needed modal shift away from private car use.

Indeed, the Planning Authority should start fulfilling its primary role of planning rather than just focusing exclusively on development permitting.

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