



Conserving Nature, Promoting Adaptive Reuse

Sustainable Stewardship of Malta's National Parks



**Conserving Nature,
Promoting Adaptive Reuse**
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Public Consultation Reply

White Rocks – Manoel Island – Fort Campbell

In response to the Government of Malta's proposed National Parks

Kamra tal-Periti

24/02/2025

Executive Summary

The Government of Malta's proposal to establish National Parks at Manoel Island, White Rocks, and Fort Campbell provides a significant opportunity to make a fundamental shift towards long-term environmental stewardship, public accessibility, and cultural regeneration. The Kamra tal-Periti welcomes this direction while emphasising that the success of these flagship projects depends on rigorous planning, strong design leadership, and a clear identity for each site.

Distinct Identity for Each Park

The Kamra strongly recommends that each proposed National Park must develop a unique, context-driven identity, shaped by its history, landscape, setting, and community relevance. Identity should act as a long-term design and governance tool, preventing ad-hoc decisions, avoiding over-commercialisation, and ensuring spaces remain primarily for public enjoyment rather than revenue-driven activities. [see section 2]

Regeneration Before Demolition

Existing structures across the three sites should be treated as assets, not constraints. Adaptive reuse provides environmental benefits through reduced embodied carbon, while preserving the cultural

narratives embedded in the built fabric. Function must be central to any restoration strategy to ensure long-term care, daily use, and active stewardship.

Quality-Led Design Competitions

Given the national significance of the parks, KTP strongly advocates for independent, open design competitions, based on measurable outcomes in sustainability, heritage protection, spatial quality, and Baukultur principles. A two-stage competition with professional remuneration ensures fairness, ambition, and excellence while reducing future maintenance burdens.

Alignment with Baukultur

The Baukultur framework reinforces a holistic, human-centred approach to the built environment. For the National Parks, this requires:

- Integrated planning of architecture, landscape, mobility, and heritage
- Inclusive, accessible design for all ages and abilities
- Long-term stewardship, not short-term intervention
- Interdisciplinary collaboration and meaningful public engagement

Connectivity & Spatial Strategy

The parks must become part of a wider national green network. Priority should be given to:

- Sustainable transport: walking, cycling, public transport, and in coastal contexts, maritime links
- Restriction of vehicular penetration
- Strong connections with surrounding communities through formal and informal spaces

Site-Specific Potentials

The following identity proposals are only indicative, simply to show how each National Park can take on a distinct role within a larger network of public spaces, avoiding overlap and encouraging diversity.

see section 2.3

Manoel Island - An Urban Park

Manoel Island's location within a dense urban context positions it as an active city park with strong recreational, sporting, and maritime potential. Its identity should emphasise daily use, walkability, and integration with Valletta, Sliema, and Gżira. Existing military and hospital structures offer significant opportunities for adaptive reuse.

White Rocks - A Coastal Cultural & Educational Park

With an extensive shoreline and a varied collection of buildings, White Rocks is well-suited for a cultural, educational, and research-oriented identity. The site can become a national hub for environmental awareness, science, outdoor learning, and adaptive reuse. Its coastal setting supports low-impact recreation and landscape-driven design.

Fort Campbell - A Landscape & Heritage Park

Fort Campbell's remote coastal setting and unique military fabric lend themselves to a landscape-led, contemplative park rooted in ecology, memory, and heritage conservation. The site requires sensitive intervention, extensive restoration, and careful phasing due to its fragile condition. Its identity should privilege nature, tranquillity, and minimal built intervention.



Foreword

Malta has the potential to undertake a historic shift in its spatial and environmental priorities through the proposed designation of three National Parks. The Kamra tal-Periti welcomes this important step, which redefines three sites as open and public spaces, reversing the development-driven briefs previously in place and prioritising their civic and communal value.

This document outlines a framework to ensure that these parks are designed, governed, and implemented with architectural excellence, policy clarity, and long-term civic benefit. It is written in response to the ongoing *Shape Your Space* public consultation on:

WHITE ROCKS, Pembroke

MANOEL ISLAND, Gżira

FORT CAMPBELL, Mellieħa

Whilst commending this initiative, the Kamra calls for high-quality design and long-term vision; one that foregrounds the continuity of existing uses and

the responsible stewardship of current structures. The histories of these sites show the risks of neglect, disrepair, and legal ambiguity, and these must be avoided in the renewed planning and development processes ahead. If approached with care, clarity of purpose, and architectural rigour, these parks can become enduring civic assets.

The Kamra commends the ambition to invest in large-scale public open spaces and recognises the significance of this initiative for Malta's environmental, social, and cultural future. This document, therefore, highlights principles that the Kamra considers essential to the success of the project, particularly given the unique contexts, histories, and sensitivities of the three sites. It reflects the Kamra's conviction that stronger investment in the design stages, aligned with international best practice, will lead to higher-quality and longer-lasting outcomes for the nation.

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1. Introduction & Context

1.1 Background and Purpose

The Maltese Government has launched an unprecedented public consultation on the creation of new National Parks at three strategically significant sites: White Rocks in Pembroke, Manoel Island in Gżira, and Fort Campbell in Mellieħa. This consultation forms part of the “Shape Your Space” initiative, designed to invite public input on the vision, form, and programming of these parks, to ensure they reflect the needs, aspirations, and lived experiences of residents and future users. (Parks in Malta Have Your Say)

1.2 National Parks in the Maltese Context

Malta has historically lacked large, interconnected green infrastructures, especially within urban areas. While over 200 smaller parks, gardens, and open spaces are catalogued at parksinmalta.mt offering recreational and inclusive amenities, the new National Parks proposal represent a qualitatively different scale and ambition, transforming significant land holdings with cultural, ecological, and social potential into enduring public goods.

The Government has publicly reaffirmed its commitment to withdrawing previous development calls for sites like White Rocks and Manoel Island, in favour of park creation, recognising the opportunity

to shift from private commercial proposals to spaces for community enjoyment and environmental reconnection.

1.3 The Role of Kamra tal-Periti’s Policy Committee for Architecture

This document was drawn up through the participation of various structures within the Kamra tal-Periti, including the Council, the Policy Committee on Architecture, and the Kamra’s secretariat.



Figure 1: St Patrick's Married Quarters (White Rocks). (Flickr)

1A

The Kamra is of the opinion that the withdrawal of existing development briefs for Manoel Island, White Rocks, and Fort Campbell should be done immediately, such that new policy and Local Plan revisions can be published for public consultation, redefining them as National Parks.

1B

The Kamra emphasises the need for definition of ‘National Park’ and the adoption of related policies in both the Maltese Legislation and Local Plans, which is to cover both the area enclosed within the boundary of a designated National Park, and the surroundings.



2. The Importance of Park Identity

2.1 Beyond a Generic Concept

The Kamra tal-Periti strongly believes that the success of the proposed National Parks depends on the establishment of a clearly articulated identity for each site, rooted in its physical, cultural, historical, and social context. Whilst “park” is often used as an umbrella term to describe public open spaces, its over-generalisation risks producing environments that are interchangeable, placeless, and detached from their surroundings.

National parks of this scale and significance must move beyond generic landscaping or standard recreational programmes. Instead, they should be conceived as distinct civic places, each with a primary role that informs design decisions, spatial organisation, movement patterns, and long-term management. Without such clarity, there is a risk that development becomes reactive and fragmented, driven by short-term pressures rather than a coherent long-term vision.

2.2 Identity as a Design and Policy Tool

Defining a primary identity for each park is not intended to impose rigid or overly prescriptive outcomes. Rather, it serves as a guiding framework that helps align policy objectives, architectural design, landscape strategies, and programming

decisions. A well-defined identity enables decision-makers to assess proposals consistently, resist ad-hoc interventions, and safeguard the overall intent of each site over time.

A defined identity also acts as a safeguard against the gradual over-commercialisation of public space, where parks risk becoming dominated by food outlets, entertainment venues, or revenue-driven uses at the expense of public access, environmental quality, and civic character. While complementary amenities may have a role, they should remain secondary to the park’s core purpose and public value.



Figure 2: Manoel Island's Urban Context. (Author)

2.3 Identity Potentials

The three sites proposed as National Parks differ substantially in terms of location, scale, history, and relationship to surrounding communities. Treating them through a uniform or standardised approach would undermine their potential and diminish their contribution to the wider public realm.

Manoel Island occupies a strategic position within the Grand Harbour, surrounded by dense urban fabric and connected to major population centres. Its context suggests the potential for an active urban park, with a potential strong emphasis on sports, recreation, healthy living, and maritime connectivity. Its identity could be shaped by movement, accessibility, and daily use, reinforcing links to Valletta, Sliema, and neighbouring localities.

White Rocks presents a markedly different condition, with an expansive coastal edge and a collection of existing buildings that lend themselves to adaptive reuse. The site offers a potential opportunity for a cultural, educational, and research-oriented park, where architecture, environmental awareness, and learning are integrated into the landscape. Its identity could support public engagement with science, ecology, design, and heritage, building upon its unique coastal and institutional character.

Fort Campbell, with its peripheral location and layered military heritage, suggests a more landscape-led and contemplative approach. Here, identity may be rooted in ecology, conservation, memory, and quieter forms of community use, allowing the site's natural and historical qualities to guide intervention rather than intensive programming.

These identity proposals which the Kamra tal-Periti is presenting are indicative rather than exhaustive, demonstrating how each site can develop a distinct role within a network of public spaces, avoiding duplication and reinforcing spatial diversity.

2.4 Identity as a Long-Term Commitment

Once established, the identity of each park should be reflected not only in initial design proposals, but also in governance structures, development controls, and future decision-making processes. Identity must be understood as a long-term commitment, ensuring that the parks evolve coherently over time rather than being incrementally diluted.

By grounding each national park in a clear, context-driven identity, Government can ensure that these spaces become authentic, meaningful, and enduring civic assets; places that respond to Malta's specific conditions rather than replicating generic international models.

2A

The Kamra urges the Government to establish a distinct and independent identity for each of the proposed National Park, which is to guide future development. This identity should arise from the Cultural, Historic and Geographic Context (amongst others) of the space.

2B

The Kamra is of the opinion that the new National Parks are to prioritise public access and enjoyment over commercial activities.

2C

The Kamra emphasises the need for a long-term commitment towards the upkeep of the new National Parks and their identity, as a response to Malta's specific conditions rather than an adoption of international models.



3. Existing Structures; Regeneration and Conservation

3.1 Existing Buildings as Assets. not Constraints

Across the three proposed national park sites, a number of existing buildings and structures form an integral part of their physical and historical character. These elements should not be considered as obstacles to development, but as assets that can meaningfully contribute to the identity, sustainability, and lived experience of each park.

These structures embody layers of Malta's social, military, institutional, and architectural history. Their presence offers continuity and authenticity, anchoring new interventions within an existing narrative of place. It is therefore strongly advocated that an approach based on the regeneration and rehabilitation, rather than demolition or superficial preservation is adopted.

3.2 Adaptive Reuse as a Principle of Sustainability

True sustainability extends beyond environmental performance or material efficiency. It also encompasses the responsible stewardship of existing built fabric, recognising the embodied

energy, cultural value, and spatial intelligence inherent in existing structures.

Adaptive reuse allows buildings to be reintegrated into contemporary public life, accommodating new functions while respecting their architectural character. Educational, cultural, research, sporting, or community-oriented uses can ensure that these structures remain active and accessible all year round, rather than becoming isolated artefacts within a landscaped setting.

Demolition, by contrast, often results in irreversible loss not only of heritage assets, but also of opportunity. This further emphasises that regeneration should be the default position, with demolition not considered lightly, and only where buildings are unquestionably beyond repair.



Figure 3: Existing Structural Remains within Fort Campbell's perimeter. (Lovin Malta)

3A

The Kamra considers the existence of buildings and structures within the areas of the proposed National Parks as a meaningful contribution to the identity of the park. New interventions should be sensitive to the narrative of the place whilst existing structures are to be rehabilitated.

3B

The Kamra encourages the adaptive reuse of existing buildings from a carbon reduction perspective. Retaining and repurposing existing structures can significantly reduce embodied carbon, minimise material waste, and improve cost-effectiveness.



3.3 Function as a Catalyst for Long-Term Care

Restoration of existing structures without a clearly defined function risks producing buildings that are visually improved yet underused or eventually abandoned. Experience shows that structures lacking a meaningful role within their wider context deteriorate rapidly once initial investment subsides.

The Kamra stresses that function is central to any rehabilitation strategy. By assigning appropriate, identity compatible uses, regenerated buildings can become active contributors to daily life within the park, generating movement, surveillance, care, and a sense of ownership. This approach supports long-term maintenance and reduces reliance on repeated cycles of public funding for repair. Through low-impact, appropriate and year-round uses, the built aspect of the new National Parks should support its ongoing maintenance and be complemented with water and energy management strategies that prioritise endemic and climate-adapted plantings.

3.4 Sensitive Interventions and Architectural Quality

Regeneration and conservation do not imply the preservation of buildings in time, nor a resistance to change. Rather, it defines a requirement for careful, informed architectural intervention, guided by an

understanding of each structure's significance, construction, and spatial qualities.

New additions or alterations should be legible, restrained, and proportionate, avoiding pastiche while respecting scale, materiality, and character. This demands professional expertise and a commitment to architectural quality at every stage of design and implementation.

By adopting a regeneration-led approach, the Government can demonstrate leadership in sustainable development, heritage stewardship, and architectural responsibility, ensuring that the proposed national parks are enriched, rather than restrained, by their existing built fabric.



Figure 4: condition of some existing structures at Manoel Island. (Author)

3C

The Kamra stresses that function must be central to the rehabilitation strategy of existing structures and spaces within the National Parks, breathing new life into dilapidated spaces and creating enduring civic places.

3D

The Kamra urges policy makers to implement long-term circular and sustainable strategies for the maintenance and upkeep of the National Parks, avoiding reliance on public funds through year-round usage, low-impact revenue generation and green initiatives.

3E

The Kamra strongly emphasises that regeneration should be carried out through careful and informed architectural interventions, adopting conservation principles such as the legibility of modern interventions, and requiring an array of professional expertise as a commitment to the architectural quality of the National Park.



4. Ensuring Design Quality: Competition Process

4.1 A Quality-Led Process

The proposed National Parks represent projects of exceptional public interest and importance, with long-term implications for Malta's spatial, environmental, and cultural landscape. As such, their design and implementation must be guided by a quality-led procurement process, rather than conventional mechanisms that prioritises smaller expenditures.

Public open spaces of this scale are not commodities that can be adequately delivered through standardised tendering. Their success depends on vision, design intelligence, interdisciplinary collaboration, and long-term value, qualities that cannot be meaningfully assessed through quantitative and numerical evaluations alone.

4.2 Limitations of Traditional Tendering

Approaches

Traditional procurement models, particularly those driven by lowest-cost criteria, often incentivise risk aversion, minimal intervention, and short-term savings at the expense of spatial quality and durability. In the context of National Parks, such approach risk producing compromised designs that

fail to respond sensitively to context, identity, and public expectations.

Furthermore, traditional adjudication protocols can discourage innovative thinking and reduce opportunities for emerging and established practices to propose ambitious, well-researched solutions. For projects intended to serve generations, the Kamra considers this as an unacceptable risk.

4.3 Design Competitions as Best Practice

The Kamra has always been a vocal advocate for procurement through design competitions, and therefore, strongly recommends that the design of the National Parks be procured through an open, transparent, and professionally structured design competition process, in line with Union of International Architects (UIA) and UNESCO architectural design competition guidelines.

A competition framework prioritises:

- Design quality and conceptual clarity
- Contextual and cultural responsiveness
- Environmental and social sustainability
- Long-term adaptability and value

Such processes are widely adopted across Europe for major civic projects, ensuring that public

investment results in spaces of enduring quality and relevance. In ensuring transparency and avoiding bias, the organisation and awarding of such competition can be undertaken independently from the Government or its entities, relying on experienced independent (and potentially foreign) bodies to collect submissions and adjudicate.

However, for a design competition to be fair, an explanatory brief with measurable outcomes is

required. This brief should outline specific, relevant and achievable goals in terms of environmental performance, biodiversity protection, climate resilience, and long-term operational efficiency as well as goals that are aimed at the protection of the existing cultural landscape. The inclusion of such goals ensures that design proposals are evaluated not only on aesthetic and functional merit but also on their capacity to deliver tangible, long-term, sustainable benefits.

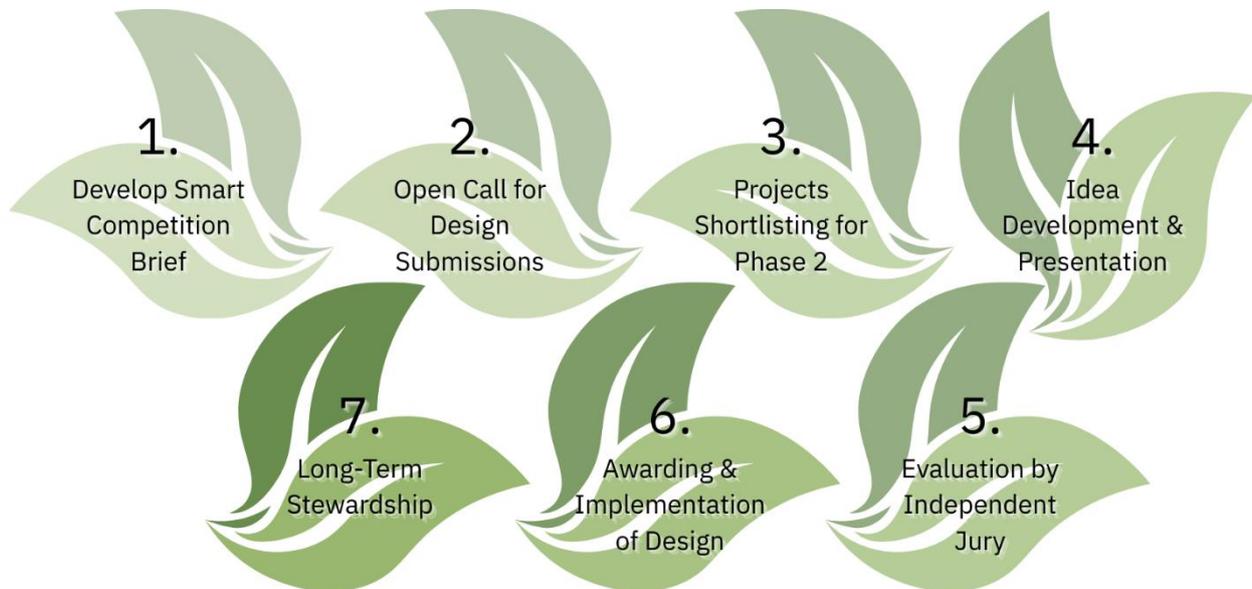


Figure 5: Road map to achieving Long-Term Stewardship, as outlined in section 4. (Author)

4A

The Kamra strongly recommends that the procurement processes involved in the redevelopment of the National Parks should be guided by quality and that awarding processes should distance themselves from quantitative evaluations that favour the smallest expenditure.

4B

The Kamra believes that the design of all three National Parks should be taken independently, and procured through an open and transparent design competition, in line with international best practices.

4C

The Kamra recommends in favour of a smart competition briefs, with specific, relevant, attainable and measurable goals toward the betterment of the environment and culture.



4.4 Policy Committee for Architecture's Proposed Competition Model

To balance openness with rigour, the Policy Committee for Architecture within the Kamra tal-Periti proposes a two-stage competition model:

- Stage One: An open call leading to the shortlisting of five finalist teams, selected on the strength of their conceptual approach, understanding of context, and professional capability.
- Stage Two: The shortlisted teams are invited to further develop their proposals in greater depth. Crucially, these teams should be adequately remunerated for their work, recognising the professional time and expertise involved and ensuring equitable participation.

The final proposals should be presented publicly, fostering transparency and allowing for informed public discourse. The credibility of any design competition depends on the composition and independence of its jury. The Committee recommends that the jury include a balanced mix of local and international experts in architecture, landscape architecture, urban design, and related disciplines.

International jury members bring external perspective and benchmark projects against global

standards, while local professionals ensure sensitivity to Malta's climate, culture, regulatory framework, and social realities. This combination strengthens decision-making and reinforces public confidence in the process.



Figure 6: A View of Manoel Island's shore. (Lovin Malta)

4.5 Long-Term Value over Short-Term Cost

While design competitions may require a greater upfront investment of time and resources, they consistently deliver superior long-term outcomes, reducing lifecycle costs and enhancing public value. Well-designed parks are more resilient, more adaptable, and more likely to be embraced and cared for by their communities.

By committing to a competition-based procurement process, Government can signal a clear commitment to excellence, transparency, and responsible stewardship, ensuring that the proposed national parks stand as benchmarks for future public projects in Malta.

4D

The Kamra maintains that design-competition-led procurement demonstrates a genuine commitment to the vision and objectives emerging from the public consultation, increasing the probability of community support. It further believes investing early in securing the highest-quality design will yield enduring results that ultimately reducing future maintenance and upgrade costs.

5A

The Kamra believes that the new National Parks must respond to the existing landscapes and communal context whilst delivering meaningful social and environmental benefits. The sense of place, stewardship and experience should be at the centre of all decision making, as outlined by Baukultur framework.



Kamra tal-Periti's Service

The Kamra tal-Periti offers the organisation and management of architectural design competitions as a transparent, quality-based procurement method. This service has previously been provided in collaboration with the Parliamentary Secretariat to the Social Accommodation and the Housing Authority, where the Kamra managed the competition process used to procure design solutions for publicly funded projects. The Kamra is open to discussing the organisation of such competitions on behalf of Project Green, with regards the development of National Parks



Figure 7: Graphics from the Sustainable Communities Initiatives, 2019 (top) and 2020 (bottom). (Kamra tal-Periti)

5. Alignment with the Baukultur Principles

5.1 Baukultur as a Holistic Framework

Baukultur is a German term that has become central in European discussions about the built environment, architecture, planning, and cultural heritage. It has no perfect English equivalent, but it generally means “The culture of building”, encompassing all processes and outcomes that shape the built environment: architecture, engineering, planning, landscape design, heritage, infrastructure, and even construction practices and public decision-making. The idea was formalised in the Davos Declaration (2018), endorsed by EU and Council of Europe member states. It states that High-quality Baukultur is a public good and requires long-term political commitment.

Endorsed by the Kamra, the Policy Committee for Architecture strongly recommends that the planning, design, and implementation of the proposed national parks be explicitly guided by the principles of Baukultur. Baukultur provides a comprehensive framework for understanding the built environment as a cultural, social, environmental, and economic whole, rather than as a collection of distinct interventions or technical solutions.

At its core, Baukultur places human experience, sense of place, and long-term stewardship at the centre of decision-making. It recognises that quality in the built environment arises from the integration of architecture, landscape, infrastructure, heritage, and public space, all shaped through inclusive and interdisciplinary processes.



Figure 8: Principles of High Quality Baukultur. (Europa Nostra).

5.2 Relevance of Baukultur to the Maltese Context

Malta's dense urban fabric, layered history, and limited land resources make the application of Baukultur principles particularly pertinent. In such a context, large-scale public projects carry heightened responsibility; they must respond sensitively to existing landscapes and communities

while delivering meaningful social and environmental benefits.

Applying Baukultur ensures that the proposed National Parks are not conceived as isolated interventions, but as integral components of Malta's wider spatial, cultural, and ecological systems. It supports continuity with local identity, climate, and material traditions, while encouraging contemporary architectural expression rooted in place rather than imported or generic models.

5.3 Human-Centred and Inclusive Design

A central tenet of Baukultur is the prioritisation of people and everyday use. Public spaces must be designed to accommodate diverse users across age groups, abilities, and social backgrounds, fostering inclusion, accessibility, and comfort.

In the context of the national parks, this translates into environments that encourage daily use rather than occasional visits, support informal social interaction as well as programmed activities, and provide a balance between active and contemplative spaces. Designing with these principles in mind enhances social cohesion and ensures that the parks become embedded in the rhythms of everyday life.

Baukultur promotes sustainability not only in environmental terms, but also through durability,

adaptability, and care over time. Well-conceived spaces are resilient to changing needs and pressures, reducing the need for frequent interventions or radical alterations.

By grounding the parks in Baukultur principles, Government can reinforce a culture of long-term stewardship, where design quality, maintenance, and governance are considered as a continuum rather than as separate phases. This approach supports responsible investment and protects public assets for future generations.

5.4 Interdisciplinary Collaboration and Public Engagement

Finally, Baukultur encourages collaborative processes that bring together architects, landscape architects, planners, engineers, ecologists, artists, and communities. Such interdisciplinary engagement enriches design outcomes and ensures that multiple perspectives inform decision-making.

Incorporating Baukultur principles into competition briefs, evaluation criteria, and development guidelines would formalise this collaborative ethos and strengthen the link between public consultation outcomes and design responses. In doing so, the National Parks can become not only physical spaces of quality, but also collective projects shaped through shared responsibility and dialogue.

5B

The Kamra is an advocate for accessible public spaces, accommodating diverse users of varying age, ability and background. This translates into a space that appeals to daily usage versus occasional visits, and that lends itself to informal interaction and organised activities, all whilst balancing active and contemplative spaces.

5C

The Kamra considers the integration of Baukultur principles and the collaboration of diverse professional disciplines as essential elements that should be actively encouraged in the procurement of designs for the new National Parks.



6. Connectivity, Mobility & Spatial Strategy

6.1 Parks as Part of a Wider Spatial Network

The proposed National Parks should not be conceived as isolated destinations, accessed primarily for occasional visits. Instead, they should form part of a coherent and connected network of public spaces that integrates national-scale parks with neighbourhood-level open spaces across Malta.

Understanding the parks as components of a wider spatial system strengthens their role in everyday life, reinforces territorial cohesion, and maximises public benefit. It also ensures that investment in large parks does not occur at the expense of smaller, community-based spaces, but rather complements and enhances them.

6.2 Sustainable and Inclusive Mobility

Accessibility is fundamental to the success of public open space. The Committee strongly advocates for a mobility-first approach that prioritises walking, cycling, and public transport over private car dependency.

Safe pedestrian routes, continuous cycling infrastructure, and clear connections to public transport nodes should be embedded in the design of each park from the outset. In coastal or harbour

contexts, maritime transport may offer additional opportunities for sustainable access and should be considered where appropriate.

Ensuring that the parks are accessible to people of all ages and abilities is essential. Universal design principles should inform routes, gradients, surfaces, and wayfinding, enabling inclusive use and reinforcing the parks' civic role. A good park design is one that balances these accessibility standards without compromising the natural nature of the space.

6.3 Linking National Parks to Local Communities

National parks derive their vitality from daily interaction with surrounding communities. Strong physical and visual connections to adjacent neighbourhoods encourage regular use, passive surveillance, and a sense of shared ownership.

The Kamra supports the creation of a hierarchy of open spaces, where National Parks are complemented by smaller parks, green corridors, and civic spaces that act as local gateways and extensions of the larger sites. This approach distributes green infrastructure more equitably, reduces pressure on single destinations, and

embeds the parks within existing urban and rural fabrics.

In addition, a balance between formal and informal spaces within the boundary of a National Park should be sought. For the benefit of local communities and the general public, the hierarchy of open spaces should avoid a predominance of developed, open spaces in favour of informal, greener options.

6.4 Research-Led Site Selection and Strategic Planning

Beyond the three sites currently under consultation, the importance of a research-led and transparent framework for the identification and development of public open spaces at a national level cannot be understated.

Such a framework should assess:

- Existing deficiencies in access to green space
- Population distribution and demographic needs
- Connectivity between open spaces and transport networks
- Opportunities for rehabilitating underused or degraded sites

Aligning park development with a broader national spatial strategy ensures coherence, avoids

duplication, and supports more equitable territorial development.

6.5 Long-Term Spatial Coherence and Resilience

Approaching National Parks through a strategic spatial lens enhances their resilience to future pressures, including urban growth, climate change, and shifting social needs. Connectivity, mobility, and spatial planning must therefore be treated as foundational design considerations, not secondary or residual concerns.

By embedding the proposed national parks within an integrated network of public spaces and sustainable mobility systems, the Government can ensure that they function as inclusive, accessible, and enduring public assets, contributing meaningfully to Malta's environmental quality and quality of life.



Figure 9: Fort Manoel's connection to the sea. (Author)

6A

The Kamra supports the provision of safe, legible, and direct connections to public transport for both pedestrians and cyclists. Maritime options in coastal and harbour context provide additional sustainable means of accessing the National Park. Vehicular access within the National Park should be restricted and regulated.

6B

The Kamra supports the implementation of multiple formal and informal spaces which presents a hierarchy of spaces in and around the National Parks, and a more equitable distribution of green infrastructure.

6C

The Kamra urges spatial policy makers to consider connectivity and mobility as fundamental, rather than secondary concern.



Conclusion

Principles and Conditions for Success

The Kamra tal-Periti supports the principle of creating national parks at Manoel Island, White Rocks, and Fort Campbell, recognising the significance of this initiative for Malta's environmental, social, and cultural future. The Kamra considers this an opportunity of national importance, capable of delivering lasting public value if approached with care, clarity, and architectural responsibility.

Throughout this response, the Kamra has outlined a set of core principles that should guide the development of these parks:

- The establishment of a clear, site-specific identity for each park, rooted in context and purpose
- A commitment to regeneration and adaptive reuse of existing structures as a foundation of sustainability
- The adoption of a quality-led design competition process to ensure excellence, transparency, and long-term value
- Alignment with the Baukultur principles, placing human experience, cultural continuity, and stewardship at the centre of design

- The integration of parks within a connected spatial and mobility network, supported by strategic planning and equitable access

These principles, together with the recommendations highlighted in the document, provide a coherent framework for translating public ambition into meaningful, enduring civic spaces.

The success of the proposed national parks is not guaranteed by designation alone. Rather, it depends on a number of essential conditions being met from the earliest stages of planning through to long-term management.

These include:

- Clear governance structures that protect the public interest and uphold design quality over time
- Robust competition briefs and evaluation criteria grounded in architectural, landscape, and spatial excellence
- Interdisciplinary collaboration across professional fields and public authorities
- Meaningful integration of public consultation outcomes into design decision-making
- A long-term perspective that prioritises lifecycle value, maintenance, and adaptability

Without these conditions, there is a risk that the parks fall short of their potential, becoming fragmented, overly commercialised, or disconnected from their wider territorial role.

Final Remarks

The Maltese population already feels a strong sense of belonging to each of the sites proposed as National Parks. White Rocks and Fort Campbell are already widely used and appreciated by the public in their current state, and therefore do not require drastic interventions to attract visitors. In this regard, the timing and phasing of any proposed works will be critical, particularly since restoration efforts (especially at Fort Campbell) are expected to be extensive and time-consuming.

The Kamra tal-Periti remains fully committed to supporting the Government and relevant stakeholders throughout the evolution of this initiative. The Kamra, therefore, welcomes continued engagement and collaboration in shaping the vision, processes, and frameworks that will underpin the proposed national parks. By working collectively and transparently, it is possible to ensure that Manoel Island, White Rocks, and Fort Campbell become long-lasting public goods that genuinely enhance quality of life and reflect Malta's shared values and aspirations.

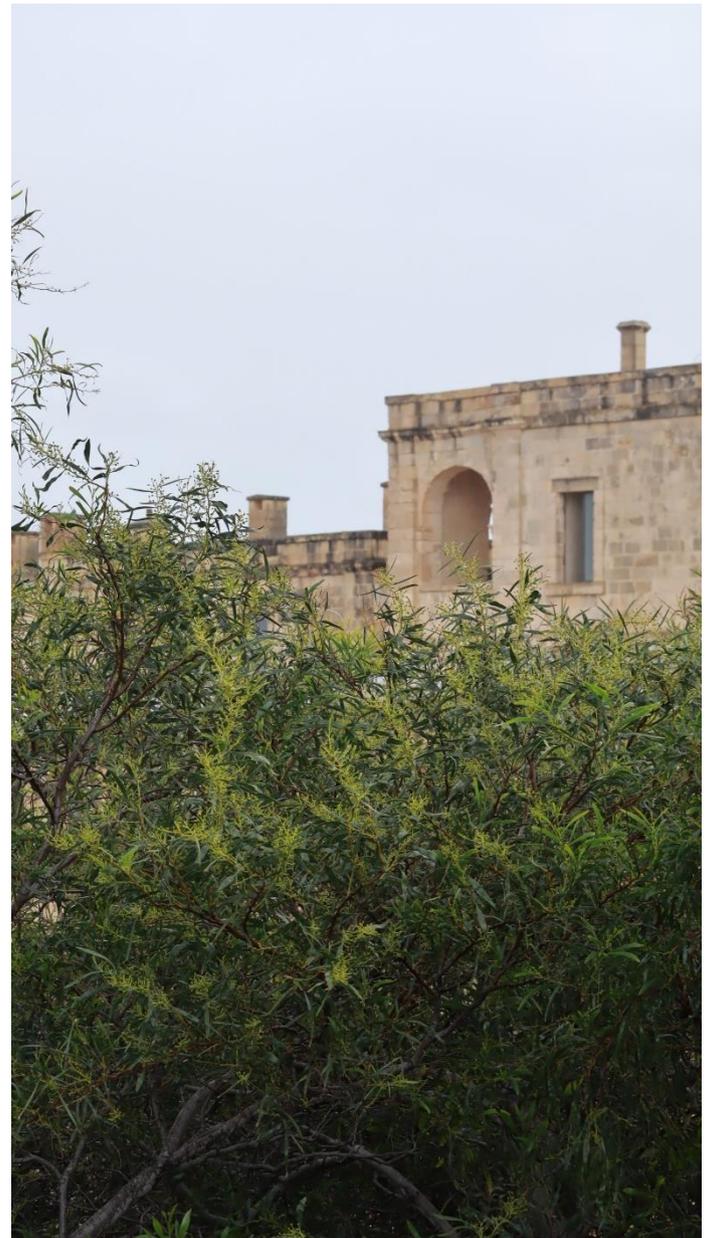


Figure 10: A view of Fort Manoel's Officers' Barracks from the public pathway. (Author)

Collection of Recommendations

1A) The Kamra is of the opinion that the withdrawal of existing development briefs for Manoel Island, White Rocks, and Fort Campbell should be done immediately, such that new policy and Local Plan revisions can be published for public consultation, redefining them as National Parks.

1B) The Kamra emphasises the need for definition of 'National Park' and the adoption of related policies in both the Maltese Legislation and Local Plans – which is to cover both the area enclosed within the boundary of a designated National Park, and the surroundings

2A) The Kamra urges the Government to establish a distinct and independent identity for each of the proposed National Park, which is to guide future development. This identity should arise from the Cultural, Historic and Geographic Context (amongst others) of the space.

2B) The Kamra is of the opinion that the new National Parks are to prioritise public access and enjoyment over commercial activities.

2C) The Kamra emphasises the need for a long-term commitment towards the upkeep of the new National Parks and their identity, as a response to Malta's specific conditions rather than an adoption of international models.

3A) The Kamra considers the existence of buildings and structures within the areas of the proposed National Parks as a meaningful contribution to the identity of the park. New interventions should be sensitive to the narrative of the place whilst existing structures are to be rehabilitated.

3B) The Kamra encourages the adaptive reuse of existing buildings from a carbon reduction perspective. Retaining and repurposing existing structures can significantly reduce embodied carbon, minimise material waste, and improve cost-effectiveness.

3C) The Kamra stresses that function must be central to the rehabilitation strategy of existing structures and spaces within the National Parks, breathing new life into dilapidated spaces and creating enduring civic places.

3D) The Kamra urges policy makers to implement long-term circular and sustainable strategies for the maintenance and upkeep of the National Parks, avoiding reliance on public funds through year-round usage, low-impact revenue generation and green initiatives.

3E) The Kamra strongly emphasises that regeneration should be carried out through careful and informed architectural interventions, adopting conservation principles such as the legibility of modern interventions, and requiring an array of professional expertise as a commitment to the architectural quality of the National Park.

4A) The Kamra strongly recommends that the procurement processes involved in the redevelopment of the National Parks should be guided by quality and that awarding processes should distance themselves from quantitative evaluations that favour the smallest expenditure.

4B) The Kamra believes that the design of all three National Parks should be taken independently, and procured through an open and transparent design competition, in line with international best practices.

4C) The Kamra recommends in favour of a smart competition briefs, with specific, relevant, attainable and

measurable goals toward the betterment of the environment and culture.

4D) The Kamra maintains that design-competition-led procurement demonstrates a genuine commitment to the vision and objectives emerging from the public consultation, increasing the probability of community support. It further believes investing early in securing the highest-quality design will yield enduring results that ultimately reducing future maintenance and upgrade costs.

5A) The Kamra believes that the new National Parks must respond to the existing landscapes and communal context whilst delivering meaningful social and environmental benefits. The sense of place, stewardship and experience should be at the centre of all decision making, as outlined by Baukultur framework.

5B) The Kamra is an advocate for accessible public spaces, accommodating diverse users of varying age, ability and background. This translates into a space that appeals to daily usage versus occasional visits, and that lends itself to informal interaction and organised activities, all whilst balancing active and contemplative spaces.

5C) The Kamra considers the integration of Baukultur principles and the collaboration of diverse professional

disciplines as essential elements that should be actively encouraged in the procurement of designs for the new National Parks.

6A) The Kamra supports the provision of safe, legible, and direct connections to public transport for both pedestrians and cyclists. Maritime options in coastal and harbour context provide additional sustainable means of accessing the National Park. Vehicular access within the National Park should be restricted and regulated

6B) The Kamra supports the implementation of multiple formal and informal spaces which presents a hierarchy of spaces in and around the National Parks, and a more equitable distribution of green infrastructure.

6C) The Kamra urges spatial policy makers to consider connectivity and mobility as fundamental, rather than secondary concern.

Photos and Images:

Cover Page: Parks in Malta. (2025). *Have your say*. Retrieved from <https://parksinmalta.mt/>: <https://parksinmalta.mt/have-your-say/>

Figure 1: David. (2011). *David* | Flickr. Retrieved from Flickr: https://www.flickr.com/photos/urban_shadow/6021536362

Figure 3: Lovin Malta. (2025). *Watch: Mellieħa's Fort Campbell To Be Turned Into A National Park, Abela Confirms*. Retrieved from Lovin Malta: <https://lovinmalta.com/news/watch-melliehas-fort-campbell-to-be-turned-into-a-national-park-abela-confirms/>

Figure 6: Lovin Malta. (2025). *Manoel Island Is Getting A Major Glow-Up: Here's What's Coming*. Retrieved from Lovin Malta: <https://lovinmalta.com/news/manoel-island-is-getting-a-major-glow-up-heres-whats-coming>

Figure 7: Kamra tal-Periti (2020). *Sustainable Communities ADC // Briefing Sessions*. Retrieved from Kamra tal-Periti: <https://kamratalperiti.org/event/sustainable-communities-adc-briefing-sessions> & Kamra tal-Periti (2019). *Specialised Housing Design Competition // Exhibition*. Retrieved from Kamra tal-Periti: <https://kamratalperiti.org/event/specialised-housing-design-competition-exhibition>

Figure 8: Europa Nostra. (2021). *Europa Nostra fully endorses the Davos Baukultur Quality System also as key principles for the New European*



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