



Consultation Reply

Discussion Paper

Alternative Road Surfaces for Noise Reduction

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Reference is made to the consultation process currently under way in relation to the draft discussion paper on 'Alternative Road Surfaces for Noise Reduction', to be used as guidance to your officers while in consultation with the Planning Authority on applications for embellishment in public open spaces.

While commending the Authority on the initiative of the formulation of this document, we would like to put forward the following over-arching concerns, even though it is appreciated that this is not an official guidance document:

1. What 'roads' is this document referring to? Will there be a limit to where these specifications will apply?
2. Literature review was not included; case studies mentioned in passing; references missing – could more information be included?
3. Testing methodology used was not described.
4. The document refers to a specific material to be used – noise attention bricks. Does this mean that only this material can be used? Could other materials be allowed following the required specification?
5. Access for all is not considered when using this type of brick material.
6. Concept of circular economy and the use of bricks is also questionable. What will happen to these once removed?
7. What will happen to the lava and cobble stones that are currently installed? Will these be removed and placed in landfill sites?
8. Why was there no attempt to consider alternative paving which include other infrastructure such as water, e.g., permeable surfaces, in order to mitigate the effect of hard paving around these embellished areas?

Furthermore, this is document should be used as part of a holistic solution with respect to:

- a) Maintenance programmes and level of workmanship – especially those that need input from other companies providing utilities.
- b) It would be opportune to broaden the scope of noise reduction to include transport planning measures such as traffic reduction, diversion of through-traffic away from residential areas and town centres, pedestrianisation, and urban design interventions to reduce carriageway widths and increase facilities for pedestrian and micro-mobility means of transport.