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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

KAMRA TAL-PERITI PUBLIC CONSULTATION RESPONSE A STRATEGY FOR VALLETTA

22nd July 2016

Strategic Framework

The *Kamra tal-Periti* supports the development of a strategy for Valletta. It notes, however, that this is the tenth such document published in the last fifty years, none of which went into the implementation phase. The *Kamra* stresses the need to ensure that research, concepts and proposals that were formulated as recently as 2013 should be built upon rather than wholly disregarded.

The *Kamra tal-Periti* places great importance in the preparation and implementation of a national strategy for Valletta, and is keen to contribute in any way it can. To this end, the KTP shall be organising a national conference on Valletta in the very near future to engage local and international architects with particular expertise on the subject matter in a public debate to analyse this complex issue in a most thorough manner.

With respect to the draft document *A Strategy for Valletta*, the *Kamra* would like to make the following observations:

1. The focus must be shifted upon Valletta as one holistic vibrant city and not sectioned by invisible lines and delineations segregating uses rather than promoting their interaction. A more organic and matter-of-fact approach needs to be adopted by policy makers, and a more lenient approach encouraged by the Planning Authority (PA). Albeit, the establishment of an overarching plan which is dynamic and which responds to the organic development of the city would ensure that such initiatives are guided towards achieving the regeneration which is being sought after.
2. Spatial planning which focuses on activity and space rather than the obsolete zone planning system should be promoted. This process must be initiated with the identification of localised urban characteristics and activities which one may wish to reinforce or curb should be undertaken.
3. Reinforcing the elements which have initially qualified Valletta as a World Heritage site should be one of the main objectives of the document. The city's perimeter and skyline, its Renaissance urban plan, its affiliation with the history of the Order of St. John and its role as the island's administrative and commercial epicentre should thus be not only protected but also strengthened. Such characteristics require a broader outlook towards what makes Valletta including the intangible together with the historic fabric.

4. Adopting a strategy based upon the concept that the city has to be "transformed" rather than on reinforcing the current urban regeneration highlights the way in which a blind eye is being turned towards the organic development process currently underway. Imposing changes can only work when already guided by the positive that is already happening. Strategies should be proposed which may include tax incentives or ad hoc development policies to encourage new property owners into the city and others aimed at reinforcing the current resident population. The *Kamra* feels that a heavy-handed and inflexible masterplan would be detrimental to the achievement of the proposed strategic objectives.
5. The "nodal approach" to regeneration is no longer relevant in contemporary urban design and planning paradigms and should be reconsidered.
6. The draft document appears to be more concerned with attracting new residents to Valletta rather than addressing the needs and improving the quality of life of current residents. This is felt to be one of its main shortcomings.
7. Finally, Valletta must start being assessed within the full extents of its conurbation extending from Pembroke to Kalkara. Only when this mental leap is truly embraced will Valletta's potential as a modern and functional capital city be realised.

Proposals outlined in document

Feedback on Proposal 1: Property Inventory

- The conclusion of the 'inventory' process, which has been going on for more than a decade, is now long overdue. A fundamental outcome of this process is the publication of the inventory on a publicly-accessible GIS platform.
- This process should also be widened to include privately-owned properties thereby creating a more efficient real estate market through the improved market information.
- The GPD should desist from passing on further Joint Office residential properties to the Housing Authority for social housing accommodation. There are over 700 social housing units in Valletta, which is more than can be found in the whole of Cottonera. Vacant and under-utilised public properties should be commercially sold to middle-class first-time buyers to promote a more balanced and diverse local community in the Capital.

Feedback on Proposal 2: Pilot Area for Regeneration

- The *Kamra* submits that this proposal reinforces an outdated zoned planning regime. Regeneration of local areas should be carried out organically through private investment.
- Public intervention in regeneration projects should be limited to targeted projects aimed at catalysing private investment. Examples of such projects could include the creation of high-quality public spaces, the conversion of public buildings from

government departments into buildings of public use, such as exhibition or performance space, fiscal incentives for restoration and conservation of privately-owned properties, the relaxation of dogmatic planning policies which prohibit the conversion of abandoned upper floors in a commercial building for residential use.

- The principal objective of regeneration projects should be that of improving the quality of life of current local residents. New activities which are incompatible with existing residential nature of certain areas should be redirected or controlled

Feedback on Proposal 3: Transport Strategy

- A transport strategy for Valletta should prioritise transport within the city, with special emphasis on pedestrian flows, including the physically impaired.
- The use of automotive vehicles within the city walls should be strongly discouraged. Parking within the walled city centre should be progressively reduced.
- Government should explore the possibility of constructing an underground carpark underneath the modern parts of the Valletta ring-road.
- Pedestrianisation has proven to be beneficial to the quality of Valletta's urban spaces, the liveability of the city, improved business particularly in the catering sector. The fear of pedestrianisation was proven to be unfounded. Based on past experience, further pedestrianisation initiatives aimed should be explored.
- The Transport Strategy for Valletta published by Transport Malta should form an integral part of this document.

Feedback on Proposal 4: University Campus

- The *Kamra tal-Periti* agrees with this proposal in principle, but fails to understand why this is the only 'node' being given immediate priority. There is too little detail in the document to justify the urgency of this proposal, which seems to be an isolated action.
- The creation of a proper university campus must be coupled with proper planning for student accommodation, and recreational and leisure amenities associated with student populations.
- Moreover, apart from the romantic notion of the rebirth of a university campus in the old university building, there appears to be scant evidence to support the case for the proposal's sustainability. The term 'campus' implies a sizeable student population which surely cannot be accommodated on this site. The reason why the Royal University of Malta moved to Tal-Qroqq was precisely because the old building was not suitable for such a purpose. Other more appropriate sites for such a use, such as Fort St Elmo, could be considered.

Feedback on Proposal 5: Strategic Nodes

- One must be careful so as not to impose new uses in these areas without taking into consideration what is already there. A great deal of caution should be exercised when talking about “high-quality recreation areas” that erode recreational space for existing local communities, thus depriving them of scope for leisure and recreation.
- The document illustrates a general drive to push away uses which in our eyes are incompatible with a Heritage City when truly these uses are what made it so. For example, the current use of Barriera Wharf and the surrounding area as industrial stores should be reinforced. We must look at safeguarding the intangible history and intangible culture of the place as well as the historic fabric. Turning stores into wine bars might restore the built fabric but lose the soul of the space.
- On the other hand, the creation of well thought and well planned crowd pullers is important especially if they form part of a conservation and regeneration of a dead area as in some of the cases mentioned. A pedestrian and cycling promenade from the Valletta Waterfront all the way to Marsamxett, and possibly beyond could be one such proposal which warrants study. This would include widening of existing sea-front walkways; a foot bridge between Lower Barrakka and the Siege Bell Memorial; and a link or bridge between Great Siege Road and Triq Vincenzo Dimech via the Excelsior front porch. This could become Malta’s longest promenade effectively linking pedestrians, joggers and cyclists through Msida, Gzira, Sliema and St Julians to the capital.

Feedback on Proposal 6: Management

- Valletta needs a single site management entity to holistically coordinate its different stakeholders, and with enough powers to be able to control them. Valletta should be managed by a single public entity acting as a liaison and facilitator between the private investors and the authorities which share the responsibility of Valletta’s development policies.
- While agreeing with roofscape greening, one must keep in mind the original design of the city when suggesting the greening of open spaces. One must remain truthful to the historicity of the urban fabric or interpret it within any new interventions. Should roofscaping be encouraged, the PA should allow access to roof tops, construction of pergolas, planters and small pools which are normally not viewed favourably by the Authority, since if these areas cannot be used they will wither away and continue to be redundant. At the same time the PA should be more rigid when it comes to uncontrolled rooftop services, and cease allowing mobile antennae made legal with DNOs.
- All telecommunications companies should be legally bound to remove all cables and service boxes from Valletta’s facades and integrate them with the underground system, before 2018.
- Scheduled buildings currently occupied by government ministries and administration offices should be independently monitored to ensure that any

works conducted on the fabric conform to national and international policies governing conservation and restoration as well as good practice.

- Government is encouraged to review the occupation of buildings of architectural and historical importance by non-essential and back-office public administration functions. Such buildings should be incorporated in support of regeneration projects whenever possible.
- The proper use of conservation orders for derelict properties in Valletta should be introduced as soon as possible as part of this strategy. In parallel, incentives for the restoration and rehabilitation of such buildings by new property owners, as already mentioned, would contribute towards diminishing the number of vacant properties in Valletta.

Our Proposals

1. An overarching objective should be identified and held as a focal point of reference as the document currently has none. This should be **“Enforcing Valletta’s tangible and intangible significance as a symbol of national identity.”**
2. Residential use should not be put on an equal footing with commercial uses. Indeed, residential uses should be allowed in commercial buildings, but the opposite should be prohibited. Allowing for mixed uses in historic fabric would contribute towards a decrease in the number of vacant properties.
3. A retail planning policy for Valletta should not be drawn up in isolation but must address competitive forces in nearby retail centres such as Sliema and Tigné, Paola, Hamrun, Birkirkara and Mosta. One way of giving Valletta a competitive edge is granting Valletta retail outlets a lower VAT rate.
4. Retail for local residents should focus on groceries, vegetable sellers, wine shops, etc, adequately distributed and offering sufficient choice and competitive pricing so as to make living in Valletta affordable and its residents’ quality of life comparable to that of other towns in Malta. Affordability and choice of food has a direct impact on people’s health. Conscientious planning should be made to address these matters.
5. Restoration and conservation must be encouraged and incentivised, including through tax rebates.