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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*

## **Partial Review of the Ta' Qali Action Plan (2000) - Phase 3**

PUBLIC CONSULTATION PROCESS

COMMENTS BY KAMRA TAL-PERITI

16 OCTOBER 2020



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The *Kamra tal-Periti* had submitted its comments as part of Phase 2 of the consultation process carried out by the Planning Authority on the Partial Review of the Ta' Qali Action Plan. The *Kamra* notes that its main concerns related to the appropriate and complementary land use to the existing Ta' Qali National Recreation Centre, and traffic generation due to the fact that the area is considerably out-of-town, rendering the vehicle essential for access, have not been addressed. These concerns are hereby reiterated.

Notwithstanding the above, the *Kamra* has assessed the proposed amendments and has the following comments:

- The fact that the site should be subject to one comprehensive application is positive, since hopefully, the necessary studies will be carried out as part of such application. Unfortunately, however, the height limitation is still set at a maximum of 17.50m. The *Kamra tal-Periti* still feels that this proposed maximum height limitation of 17.50m is preposterous and should be revised downwards to 12.30m throughout with no semi-basements being allowed.
- The draft stipulates that the 17.50m limitation is applicable “for all the Policy Area”, however it then stipulates that “Development on the perimeter of the Policy Area facing the ODZ shall have a façade height of 8m” and that “Development on the perimeter of the Policy Area facing the embassy and the carpark shall have a façade height of 11m.” These two statements are incongruous with the 17.50m limitation outlined earlier. It should be clear that the 17.50m height would not override these lower heights (vide also the point below re even lower heights being proposed). It is also submitted that overall heights should be stipulated, and not just façade heights.
- The landscaping buffers identified on Map A simply indicate that along the West and South East boundary there should be a line of landscaping consisting of trees and shrubs. A minimum width of landscaped area should be defined, and efforts to further mitigate the views from Mdina and ODZ need to be included. Simply including a line of landscaping (creating a boundary with trees), is not a serious mitigation measure. Serious mitigation measures, should and would include larger landscaping buffers and stepped height limitations along these boundaries, starting from 6.50m rather than the proposed 8.00m, and rising to 12.30m.

- The proposed 40% overall open spaces should not be inclusive of the landscaping buffers along the perimeter. The perimeter landscaping buffers (currently calculated at 2,219sq.m. – which is less than 8% of the site area) needs to be properly studied and defined not simply as a line of trees around the development, which is what Map A, is unfortunately encouraging. The landscaping buffers, need to provide proper and serious visual mitigation from Mdina and Rabat, and should also be integrated with the other open spaces. For this reason, the coverage should be reduced from the proposed 60% to 45% coverage, allowing at least 15% for the perimeter buffers. This will ensure that the development itself still enjoys 40% open spaces, and reduces the risk of having a dense development.

The *Kamra tal-Periti* still feels that the proposed revision is premature and lacking in proper studies that would normally arise in a serious and well-considered approach and points out that allowing intensification is contradictory to the stated objective based on the now-redundant industrial use, and the proposals appear to be directed more towards appeasing private landowners and facilitating their interests than achieving any planning gains or safeguarding the national interest and that of the public at large.