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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 2

PUBLIC CONSULTATION PROCESS

COMMENTS BY KAMRA TAL-PERITI

25 OCTOBER 2019



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The *Kamra tal-Periti* notes with some concern, the proposal currently being tabled for the Partial Review of the Ta' Qali Action Plan and the additional uses being included in the proposal.

The proposed Ta' Qali Commercial Area extends to almost 60,000 square metres. Just to give an indicative comparison, this equates to roughly double the area of the PAVI commercial complex in Mosta, which has an area of 32,000 square metres.

It is our opinion that the logical way of approaching a planning situation is to first assess the present and future demand for land, required for particular or specific uses, and then seek ways to provide the required space. The direction of this revision is to maximise the availability of land, convert it into developable land for multiple uses, and then wait for users to queue up.

Therefore the scope of this exercise is considered to be of more benefit to the major private landowner within the Review Area, rather than the general public at large. The *Kamra tal-Periti* questions to what extent, if any, the interests of the general public have been considered in this exercise and what benefits, if any, the public, will enjoy as a result. It obviously goes without saying that the revision, as proposed, is of substantial benefit to the individual landowners since their property, previously limited to industrial use, will now multiply in value as a result.

The *Kamra tal-Periti* notes that across the developed world, out-of-town commercial centres are largely being abandoned in favour of rehabilitated inner-city or urban facilities. These reinforce the desirability of city living **and** cut down on the vehicular traffic and the attendant pollution and traffic congestion that are inevitably caused by large regional commercial developments located outside the urban area.

The location of the area under consideration at Ta' Qali, coupled with the lack of suitable public transport facilities render the use of a vehicle essential for access. Such a concentration of commercial development on a national level and outside the urban centres actually encourages increased vehicle use in direct contradiction of contemporary planning policies across the civilised world. It is felt that serious, reliable traffic impact studies and projections need to be carried out before the proposals are implemented to assess the present and future capacity of the road infrastructure leading to the site, the availability and effectiveness of public transport to and from the area **and**

also the heightened levels of pollution that will inevitably be caused by the increased car affluence.

The *Kamra tal-Periti* notes that one of the justifications presented in favour of the proposals is that the site has outlived its usefulness in the industrial context. Whilst recognising that it would, perhaps, be unrealistic to hope for the area to be returned to its undeveloped state, it is pointed out that the general area is earmarked as a Rural Area and the Ta' Qali National Recreation Centre, which includes no commercial hubs but only enterprise hubs (i.e. the existing industrial areas). It is therefore felt that the area should be re-developed into uses that are complementary to the sports facilities around the National Stadium, and to the adjacent *Park tal-Familja*. The emphasis on commercial development is therefore questioned in this regard, as is the extent to which the public interest and that of the environment in general were considered.

The *Kamra tal-Periti* notes that following various requests at consultation stage, a number of Use Classes were added but no allocation was made for sports facilities, perhaps because the various amateur bodies catering for the various sports were unaware of the possibility and availability. It is felt that more importance should be given to indoor and outdoor sports and recreational uses and the conversion of redundant enterprise/industrial hubs should be very low-key and closely controlled.

The *Kamra tal-Periti* feels that the proposed height limitation of 17.50 metres being proposed is nothing short of preposterous and this should be revised down to 12.30 metres throughout with no semi-basements being allowed. The area should **not** be included in those zones suitable for high-rise development.

In line with Thematic Objective 1, it is stated that the boundary of the Partial Review is not intended to depart from that of land previously zoned for industry, storage, and parking. In view of this, in order to maintain a credible level of consistency, it is felt that the height limitation should approximate to that adopted for industrial buildings, i.e. 12 metres. A serious effort should be made to preserve some views, at least, from Mdina and Rabat.

The *Kamra tal-Periti* notes that although not classified as an ODZ area, in reality the site is effectively outside the development boundary, right on the periphery of an area of High Landscape Protection (Map 2A in SPED). Not only is the area outside the development boundary, but it is also a Rural Conservation Area. The rural quality should be preserved by means of a reduced building density and a firm commitment for increased landscaping and tree-planting.

A decent minimum soft-landscape coverage should be stipulated and considered separately from asphalted parking areas and other open unbuilt areas. It is noted that open, surface car parks have zero landscape value. Consequently tree-planting should not be limited to ribbons along roads or car park perimeters but concentrated in ecologically sustainable groups or woods. The lack of any criteria establishing the minimum open space to built up area is of significant concern, and it is recommended that these are established in the revised Plan.

The *Kamra tal-Periti* notes that following the requests during consultations, Class 6A (Storage and Distribution) uses will be allowed to intensify. The *Kamra tal-Periti* questions whether this means that clinics and schools (uses now included) will be permitted next to storage and distribution depots? The *Kamra* questions whether a more prudent approach could have been adopted to segregate and zone incompatible uses

appropriately and strongly recommends that in addition to the aforementioned traffic impact studies and environmental and pollution projection studies mentioned earlier, an exercise should also be undertaken to establish the relative proportions of the various uses.

The *Kamra tal-Periti* was equally perturbed at some of the replies given to questions asked during the Parliamentary Committee hearings amongst which were queries on what studies were carried out to assess traffic impacts, parking provision requirements and environmental impact. The responses given were that it was felt that these would better be dealt with at planning application stage in accordance with the respective developments being proposed. Similar replies were given in response to queries about establishing percentages and limits on the different types of uses. In the circumstances, *Kamra tal-Periti* feels that instead of taking opportunity to address the area in a properly planned and regulated manner to guarantee the best possible result which would best benefit the public, the Planning Authority has abdicated its responsibilities, and has practically given the prospective developers a free hand to propose whatever they please.

In particular with respect to parking provision, the *Kamra tal-Periti* notes the replies given during the Parliamentary Committee hearing that each development within the Plan Area will be required to provide parking in accordance with current standards. Would it not have been better to seize the opportunity of this Review to consolidate parking provision within one area, and oblige the developers to contribute towards its construction?

In conclusion, the *Kamra tal-Periti* 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.