



Consultation Reply

Draft Transport Plan

Sustainable Urban Mobility Plan (SUMP) for the Valletta Region

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Reference is made to the consultation process currently under way in relation to the draft Sustainable Urban Mobility Plan (SUMP) for the Valletta Region.

The introduction to the public consultation webpage states that “[t]he Maltese Government has invested heavily in the transport sector along the years, including moving towards more efficient transport infrastructure and sustainable transport modes. In line with this, within the framework of the CIVITAS DESTINATIONS Project (September 2016 - May 2021), which sought to integrate sustainable tourism and mobility strategies in six European island locations, the Valletta Region started to develop a Sustainable Urban Mobility Plan (SUMP). The Valletta Region is made up of the Northern Harbour and Southern Harbour Regions and thus incorporates the localities of Birgu, Birkirkara, Bormla, Fgura, Floriana, Gżira, Ħamrun, Isla, Kalkara, Luqa, Marsa, Msida, Paola, Pembroke, Pieta, Qormi, San Ġiljan, San Ġwann, Sliema, Santa Luċija, Santa Venera, Swieqi, Ta’ Xbiex, Tarxien, Valletta, Xgħajra and Żabbar.”

The Kamra tal-Periti is hereby providing its position on the draft published for public consultation.

General Comments

1. Many of the measures identified in the SUMP consultation document are measures that were already identified in the National Transport Masterplan (TMP) published in 2016. It is imperative that the SUMP, six years' later, not only simply study and explore these considerations but provide spatially specific actions and measures that advance the proposals in the TMP in a tangible manner. For example:
 - Which is the low emission zone being considered?
 - Where will priority PT routes be introduced?
 - Where will P&R be introduced?
 - How will cycling networks and priority PT routes be introduced in relation to this?
 - How will the proposed Safer Active Mobility routes for which plans are presently being prepared dovetail with the SUMP?
2. The SUMP needs to provide a well-developed plan with specific measures and proposals. This matter is of the utmost urgency and Malta cannot afford to continue to discuss vague proposals without a tangible and well-studied and co-ordinated route to action.
3. The consultation document does not provide sufficient information as to the proposed three scenarios considered. What were the parameters taken into account for these? How and with whom specifically did consultation take place?
4. The document makes no reference to implementation timelines, budgets, responsibilities etc. The absence of these suggests a lack of commitment to the attainment of tangible results.
5. It is surprising that a lack of infrastructure to support sustainable transport modes such as cycling, public transport and walking is not mentioned amongst the Challenges presented in the document. It is telling that no tangible National Initiatives have been taken on these aspects.

6. Indeed, with reference to the three questions identified for feedback we note that the core issues, greatest levers and measures with the greatest impact are all centred on the need to make a clear commitment to and prioritisation of measures that promote sustainable mobility (Pillar 1). It is telling that the proposed investment of €35M on Safer Active Mobility routes is just 5% of the budget committed in the preceding period of €700M for roads for cars. Private car usage and ownership will remain ingrained across Maltese society if the public policy framework remains similarly ingrained and fails to offer any tangible alternative.
7. Indeed, a clear commitment to demand management and disincentives for car use is required if the shift to sustainable mobility is to be successful. Measures such as parking management, controlled vehicle access and public transport priority are essential. The development of improved mobility infrastructure for public transport and cycling and pedestrian infrastructure will require a commitment to decreasing available space for cars and an investment in quality infrastructure for other road users. Park & Ride facilities and the introduction of Public Transport Quality Corridors as provided for by measures 2.3.2.1 and 2.3.1.1 in the TMP would also go hand in hand with a demand management approach. Similarly, It is disappointing that such measures are not being developed further as part of the SUMP.

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