



1 August 2013

## **The Revision of the Local Plans – Public Consultation July-Sept 2013**

### **DIN L-ART HELWA COMMENTS TO MEPA**

#### **A. MEPA should carry out the following two steps before revising the Local Plans:**

**STEP ONE:** The Local Plans should not be revised without an updated Strategy in place, to avoid piecemeal decision-making. Din I-Art Helwa calls on the government to complete a full Strategic plan, including all required public consultation, before revising the Local Plans. The Strategy should be subject to a Strategic Environmental Assessment (SEA) before being adopted.

**STEP TWO:** Once the Strategy and SEA have been completed, MEPA should then carry out a study to identify problems and weaknesses, as well as strengths, in the existing Local Plans, in relation to the Strategy. The results of this study should be made public, and a consultation should be carried out to enable the public to give their reactions. The process to revise the Local Plans should not commence before this exercise is completed.

***Furthermore, Din I-Art Helwa requests that all persons and organisations that make submissions during the consultation period should be identified and not remain anonymous, in line with previous practice.***

#### **B. Din I-Art Helwa draws attention to the following general points:**

1. Enough space to cater for housing demand is available in existing development zones and these zones should not be extended. Any new development should be guided to use or re-develop land in existing zones, or to change the use/ regenerate/ re-develop existing buildings in urban areas.
2. No further relaxation of building heights should be contemplated.
3. The capacity of urban areas must be studied before any changes are introduced, including vacant housing stock, demand, traffic flows, general infrastructure, visual amenity and general residential amenity. Data on building stock in development zones (including all permits in hand) and estimated demand over the next 10 or 15 years should be made available for consideration.
4. Existing discrepancies or inconsistencies in the Local Plans should be addressed, however it is important to retain an element of diversity in the way in which different areas are developed. For this reason, Din I-Art Helwa disagrees with the reduction of all the plans into only three Local Plans.
5. No high-rise buildings should be considered outside the main urban areas.
6. More green and pedestrianised areas should be created in urban areas, and these must be clearly identified in the Local Plans.
7. Urban Conservation Areas and Outside Development Zones should be extended and their protection should be enhanced;
8. The Local Plans should actively seek to halt the decline in biodiversity in Malta and Gozo, and include specific measures to achieve this goal.

9. The concept of 'eco-Gozo' should be retained, and actively promoted within the Local Plans. Din l-Art Helwa does not agree with the creation of a permanent link between Gozo and Malta through a tunnel or bridge over the Gozo/Comino channel.
10. Major land reclamation projects should only be considered for reasons of national strategic importance. Proposals for major land reclamation initiatives should be subject to a Strategic Environmental Assessment (SEA.)
11. Any revision of the Local Plans must be subject to a Strategic Environmental Assessment (SEA).
12. Protect cultural and historic landscapes and townscapes through detailed spatial planning schemes.

**C. The Local Plans should promote policies, including specific measures and targets, for:**

- Rainwater harvesting, including in urban areas;
- Reduction in noise pollution;
- Reduction in air pollution, especially from traffic;
- Energy-efficient buildings;
- Sustainable use of limestone;
- Regeneration of historic areas and buildings;
- Sustainable agricultural practices;
- Conservation of traditional rubble walls in the countryside;
- Protection of old buildings and streetscapes in urban areas, including outside the UCAs;
- Sustainable use of water resources, especially ground water abstraction;
- Restoration of disused quarries;
- Pleasant and harmonious streetscapes in urban areas;
- Quality in design of buildings;
- Rehabilitation and conservation of natural habitats;
- Improved policies on parking provision;
- Better traffic planning and management;
- Improved public transport system, to reduce dependence on individual car ownership and related traffic pollution and congestion;
- Prevention of the loss and fragmentation of agricultural land;
- No further residences in ODZ areas should be allowed;
- Residential development linked to agri-tourism should be located in nearby development zones, and not in ODZ areas if this requires the building of new structures;
- No changes should be introduced into Local Plans to permit additional villas in the existing villa area near Mgarr ix-Xini/ Ta' Kantra at Ta' Cenc in Gozo;
- Restrict large yacht marinas to existing harbours;
- Integrate guidelines and policy objectives for valley management into Local Plans;
- Encourage afforestation projects;
- Encourage landscaping in development projects;
- Create buffer zones for historic buildings trapped in urban development;
- Create buffer zones between UCAs and the rest of the urban development;
- Limit basement/ semi-basement and penthouse since a three-storey area ends up looking like a five-storey area, and realistically portray building heights of existing buildings;
- Allow fluidity between zoning of residential and certain commercial office uses, eg. '*casa bottega*' type developments;
- Limit excessive roads both in terms of quantity and width (eg. ring road at Zejtun).

**D. All measures and policies in the National Environment Policy of 2012 should be taken into consideration and highlighted in the Local Plans, for example:**

- Promote alternative modes of travel such as walking, biking and marine transport through the spatial and transport planning systems, and the work of Local Councils (2.2.9);
- Identify by 2012 and implement a set of controlled emission zones to address urban air pollution hotspots, by 2014 (2.2.11);
- Take measures through the spatial and transport planning systems, and through Local Councils' work, to reduce traffic in areas prone to the 'street canyon' effect (2.2.13);
- Promote the protection, upgrading and creation of additional public open space, through spatial and transport planning, and ensure its delivery through the work of central government and Local Councils (2.2.21);
- Manage coastal areas on the basis of integrated coastal management to reduce conflicts, protect the environment, maximise access in line with conservation goals, improve appearance, monitor and reduce erosion and control development (2.3.10);
- Ensure the protection of coastal areas from inappropriate development through spatial planning by 2012 (2.3.11);
- Prepare a maritime spatial plan in line with IMP by 2012 (2.3.14);
- Protect agricultural land and gardens of conservation value to avoid further soil loss by sealing and erosion through spatial planning system by 2012 (2.3.30);
- Ensure that the spatial planning system makes efficient use of land, without the need of extending the development boundaries (2.3.32);
- Ensure that only uses that specifically require a location outside the development zone, and where alternatives are not possible, will be permitted in such areas by the spatial planning regime, by 2012 (2.3.33);
- Ensure that social housing prioritises rental subsidies, or the purchase of, existing buildings, rather than building on previously unbuilt land (2.3.35);
- Encourage the use of town centre management, where stakeholders and publics are actively involved in agreeing a vision and action plan for urban areas that require urgent upgrading (2.4.2);
- Undertake a study into the best policy options for integrated improvement of degraded areas (2.4.5);
- Promote an integrated approach to urban rehabilitation through the spatial planning system by 2012 (2.4.6);
- Redesign road network to take traffic out of town centres through spatial and transport planning, and the work of Local Councils (2.4.8);
- Assess the exposure of recreational areas to traffic, and propose policy options to address the issue by 2016 (2.4.9);
- Place more emphasis on quality in design in the spatial planning process by 2012 (2.4.10);
- Issue joint guidelines to ensure that landscape management takes environmental considerations into account and implement them (2.4.13);
- Ensure that the spatial planning system takes into account the effect of development intensity on quality of life by 2012 (2.4.19);
- Control development in historic sites and areas through planning permissions (2.4.22);
- Enhance the contribution of afforestation projects to the protection of biodiversity, flood management, control of soil erosion, landscape enhancement, and public recreation by 2015 (2.4.29);
- Promote safe and healthy rural areas for informal recreation that respects the landscape character through spatial planning, and ensure its delivery through the work of central government and Local Councils (2.4.30);

- Provide areas for family and informal recreation in all 5 regions of the Islands by 2016 (2.4.31);
- Take an integrated approach to valley management, preparing guidelines for valley management by 2013 (2.4.33);
- Promote access to the countryside, including visual access, when physical access is not possible for topographical or other reasons, in line with conservation objectives, through the spatial planning system by 2012 and through enforcement of current legislation (2.4.34);
- Protect the countryside from inappropriate development through the spatial planning system (2.4.36);
- Protect cultural landscapes in Gozo through spatial planning by 2012 (2.5.5);
- Provide family-friendly recreational parks and walkways in Gozo by 2013 (2.5.6);
- Identify localities in Gozo for the storage and working of stone with a view to its re-use and recycling, and support this through the spatial planning system by 2012 (2.5.8);
- Ensure that the energy performance of new buildings meets national standards in line with the EU Directive on energy efficiency in buildings by 2012 (2.6.10);
- Review current spatial planning guidance and regulations with a view to further promoting climate change-related improvements by 2014 (2.6.11);
- Boost efforts to safeguard species and habitats in the context of the Natura 2000 network to ensure improved sufficiency of coverage by 2017 (2.6.18);
- Use spatial planning and environmental assessment tools to control impacts of development on biodiversity (2.6.25).