

**Amendments to Grand Harbour Local Plan
MEPA Response to Public Submissions
November/January 2007**

Reference	Comments	Response
<p>E-Mail Salv Mallia 14/11/2006 REF:GH001</p>	<p>GK21 ICT & Media development City Building Heights</p> <ul style="list-style-type: none"> • It is imperative to change building heights in such a sensitive historic area, not just from the water level from the sea. • Not clear whether views from sea level also include example Kalkara or Valletta Waterfront. • The Grand Harbour is a unique gem that would negatively be impacted by high rise buildings, especially in the outer harbour area near the three cities. • Such a Portomaso style tower in the ICT and media city area would be easily visible from the Grand Harbour. 	<ul style="list-style-type: none"> • MEPA requires that a master plan be prepared for the Ricasoli area. The master plan will include the envisaged heights for the area (policy GK20). • The master plan will be subject to public consultation and the heights will be suitably assessed through a visual impact assessment.
<p>ENEMALTA Corporation 21/11/2006 REF:GH002</p>	<ul style="list-style-type: none"> • Amendments to GH policies GK20, GK21. • New distribution Centre and a new tunnel to feed the main power source of this new development area. • Existing distribution network which feeds consumers not directly within the zone outlined by the appropriate highlighted area will have to be retained and should not form part of the re-development. The substation may form part of this area; however it cannot be relocated as the distribution lines are not part of the area. • Policies should also be read in the light that an extensive area has to be reserved for a distribution centre and end point of the tunnel serving the power lines on which this industrial park will depend. • Outlined substation in the attached plan should be excluded from development • Enemalta should be consulted on the siting and position of the buildings and facilities intended for the service of power provision for the area. 	<ul style="list-style-type: none"> • The Master plan to be prepared in the light of policy GK 20 will need to address all required infrastructure requirements. • Furthermore, at the development application stage Enemalta will be consulted on the proposed infrastructure provision.
<p>E G Cefai LL.D 09/12/2006 REF:GH003</p>	<ul style="list-style-type: none"> • The site is presently surrounded by areas of building development. And in the immediate future an intensification of this building development in the surroundings together with the making of the proposed street passing through the site itself will further enhance and intensify globally the present existing 	<ul style="list-style-type: none"> • The scope of the GHLP review is to facilitate the accommodation of Smart City within Ricasoli and its environs. • The request is not within the scope of the

	<p>building development.</p> <ul style="list-style-type: none"> • The site moreover qualifies in virtue of its commitment which is very high considering too that areas and sites with much lesser commitment have been included in the development zone. • The street that is proposed through the site by the Planning Directorate itself actually commits the unbuilt and relatively small plots in the site to development. In itself the street intensifies development on the land. • The site has an excellent infrastructure including that it touches at least three roads and will in the future have another important road (as proposed by the Planning Directorate) pass through it apart from all the necessary services (electricity, water and so on) at hand. This reason solely and by itself should qualify the site for inclusion in the Development Zone. • The site is committed by surrounding uses such that its only use can be as those of immediately surrounding uses. • The Planning Directorate itself in 2002 designated a large part of the site for inclusion in the SMES Site Selection Exercise. • The site is in itself so internally committed by buildings that the relatively small parts still left unbuilt can only be used for building development. 	<p>review since the request is for land currently outside the development zone to be included within the development zone. This process requires a structure plan review.</p>
<p>William Lewis 11/12/2006 REF:GH04</p>	<ul style="list-style-type: none"> • In the Transport Strategy Plan, the site in question is flanked by a pedestrian priority area. • Proposing to amend the pedestrian zone as being indicated in the attached site plan as client's site will not be prohibited from a garage. • Site is currently bound within the urban consevation area. Since site is not yet developed and is adjacent to to new development, there is no validation in having this site within an urban conservation area. • Proposed to shift urban conservation area to the other side of site. 	<ul style="list-style-type: none"> • The objective of the review is to accommodate the Smart City within Ricasoli and its environs, subsequently the request cannot be entertained as part of this review.
<p>Cachia & Associates 19/12/2006 REF: GH05</p>	<ul style="list-style-type: none"> • Requesting MEPA for the rezoning of land in Marsa, site in question falls within Marsa Park Development as per policy GM15 and Area Policy Maps Figure 12 and 15 in the Grand Harbour Local Plan. 	<ul style="list-style-type: none"> • The objective of the review is to accommodate the Smart City within Ricasoli and its environs, subsequently the request cannot be entertained as part of this review.

<p>Xghajra Local Council 8/01/2007 REF: GH06</p>	<ul style="list-style-type: none"> • <u>GT 03 South Harbour Link Road</u> <p>The South Harbour Link Road should extend along Triq San Leonard onto Xghajra and should include improvements in the access from the Zabbar side to Xghajra.</p> <ul style="list-style-type: none"> • <u>GD 04 Upgrading of Existing Industrial Estate</u> <p>We are unable to comment on the Kordin Industrial Estate.</p> <ul style="list-style-type: none"> • <u>Area Policies</u> <p>Introduction: The area demarcated by Sqaq ta' Alessi along the south side of the present Ricasoli factory area and stretching by boundaries along Triq San Leonard and the Xghajra coast, lies within the locality of XGHAJRA which is included in the Grand Harbour Local Plan. The rest of the Xghajra locality is included in the South Local Plan.</p> <p>The Xghajra Local Council strongly points out that this area (from the edge of the present Ricasoli factories facing south up to the Xghajra residential area) has to be referred to as XGHAJRA and not as Ricasoli. The coastline of this designated area is part of the Xghajra shorefront and eventual Promenade.</p> <ul style="list-style-type: none"> • <u>Approach</u> <ul style="list-style-type: none"> • Any expansionary residential or otherwise future plans including planning and considerations of community facilities should take into consideration those areas and its peripherals which are designated as part of the Xghajra locality. Special consideration should be taken as to the eventual development expansion that the ICT Media centre will most likely provoke. The Xghajra area along and on one side of Triq San Leonard borders with the St. Peters hamlet area which is in the locality of Zabbar but which has recently developed into a residential area of circa 3000 people. • Maintenance of public access to and along the shore, from Xghajra towards Ricasoli should include open recreational areas with an upgrading of the coastal access road as a promenade but restricted as a pedestrian zone without access to motor vehicles. • The Xghajra side, along Triq San Leonard should be included in all 	<ul style="list-style-type: none"> • The justification of policy GT 03 has been amended to allow for the possibility of linking other localities to the South Harbour Link Road to be studied. • MEPA acknowledges that part of the area earmarked for the development of the ICT and Media Development City is located within Xghajra. Hence reference to the location of the ICT and Media Development City will be to both Xghajra and Ricasoli. • This concern is noted and MEPA will seek to ensure that the impact of the ICT and Media Development City on both Kalkara and Xghajra in terms of both infrastructure (transport and utilities) and ancillary development will be mitigated. • MEPA reflects this point in policy GK 13. • MEPA takes note of this concern and will address it through a holistic planning approach.
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	<p>plans of upgrading, traffic management and development considerations.</p> <ul style="list-style-type: none"> • The naming of the Media Centre as a City is objected to and is disturbing. As the ICT Media Development Centre will lie between two villages, this may give rise that both Kalkara and Xghajra will somewhat lose their “Village” identity. It is strongly suggested that the so called “SmartCity” should be more appropriately named and called “The ICT Media Centre”. <ul style="list-style-type: none"> • <u>GK05. Kalkara Transport Strategy.</u> • The Xghajra Local Council strongly proposes that the introduction of a comprehensive and integrated transport strategy for Kalkara should be extended to include the route along Triq San Leonard and onto Xghajra. • Through Traffic from ICT Media Centre and along the coast from the present Ricasoli Industrial Estate should be strongly discouraged as this would eventually render Xghajra as a by pass to Marsascala. • • The improvement of Public Transport should extend and link from Cottonera to Kalkara to Xghajra along Triq San Leonard into Xghajra and through the area of St. Peters (Zabbar) with a bus terminus constructed strategically in the area to accommodate these localities. This will serve as a 2nd link of public transport towards Xghajra and the peripherals of Zabbar-St Peters, servicing an approx. population of 4000/5000 people. • • Consideration is to be taken of the fact that the Sewage recycling plant is proposed to be sited off Triq San Leonard on the south coast peripheral of the Xghajra locality in the vicinity of Fort St. Leonard and adequate access to the site is of a priority nature. <ul style="list-style-type: none"> • <u>Relevant policies: GT 01, 03, 06, 08, 09, GE 02, GK 06, 07.</u> • As already mentioned in previous paragraphs, the South Harbour 	<ul style="list-style-type: none"> • It is practice for ICT and Media Development business parks to be referred to as cities, since the acceptable land uses are more than just a workplace since they integrate a working and living environment. Examples include Dubai Internet City, Dubai Media City, Smart Villages (Egypt) , CyberCity (Jordan) and Media City UK. • The Grand Harbour Local Plan primarily deals with the localities falling within its aegis. This is an area policy within the Kalkara chapter. However, it is agreed that a comprehensive and integrated transport strategy, including public transport, for the wider area should include Xghajra and other settlements. • Policy GT 03 ensures that the ICT and Media Development City will be supported by the necessary transport infrastructure. The necessary measures need to be taken to prevent Xghajra becoming a bypass to Marsascala. It should be noted that the approved SMLP does not include a link from Xghajra to Marsascala. • Noted and this will be taken in consideration of in the application phase. • The justification of policy GT 03 has been amended to allow for the possibility of linking other localities to the South Harbour Link Road to be studied.
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	<p>Link Road should extend and include access to the Xghajra locality.</p> <ul style="list-style-type: none"> • Accessibility considerations and plans should extend and include the Xghajra area from the Present Ricasoli factories to Xghajra. This is to include the environmental improvements and protections combined with the provision of public open spaces in an environmentally friendly manner with proper pedestrian access and off road parking facilities. • The Xghajra Local Council considers that the above should be part of the packet which has to be accepted by the Government/Developers of the ICT Centre. <ul style="list-style-type: none"> • <i>GK 07 Public Transport</i> <p>This is required to extend to the Xghajra locality including the St. Peters area as part of the ICT Media Centre including adjacent and affected areas.</p> <p><u>Relevant policies: GT 05, 06, GK 05, 12.</u></p> <p>The impact of the ICT centre will affect Xghajra and the St. Peters area. Any plans complimenting an integrated public transport system should include these localities being an integral part of the main reason why the Grand Harbour Local Plan is being amended.</p> <p><u>GK 13 The Shoreline and the Rinella Recreational Area.</u></p> <p>The Xghajra Local Council strongly submits that it does not agree that designated areas of the Xghajra locality may be referred to as part of the Rinella Recreational area. It has already been pointed out that the area bounded by Triq San Leonard and the Xghajra coast road extending from the south side of the present Ricasoli factories (from Sqaq ta' Alessi), is property falling under the Xghajra Local Council. If the proposed Recreational site includes this area then we strongly suggest that it should properly be designated as the Rinella/Xghajra recreational area as a significant part of this site falls within the locality of Xghajra.</p> <p><u>Relevant policies: GN 04, GEO 06, 07, GD 10, 11, GK 08, 12, 15.</u></p> <p>The Xghajra Local Council agrees that any shoreline development/improvement should be primarily for the public "free" use and constructed with specific environmental considerations including open public spaces with adequate pedestrian access and properly planned</p>	<ul style="list-style-type: none"> • The area between the current Ricasoli Industrial Estate and Xghajra is identified by the South Malta Local Plan as a strategic open gap. The area is governed by policy SMCO 1. • MEPA agrees that the whole area needs to have an integrated transport strategy. • Policy GK 13 relates to an area located within Kalkara zoned for the purpose of recreation and the related shoreline ranging from Fort Ricasoli area to the edge of Xghajra. • MEPA takes note of this submission which is in line with the thrust of policy GK 13.
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recreational areas. A promenade should extend from Fort Rinella along the coast connecting to the Xghajra promenade incorporating the Historical Defence Trail as documented by the Xghajra Local Council. The promenade and accesses along the coast should only be for pedestrians with ample free strategically and distanced located parking lots available for the visiting public with a managed access from the link road in an environmentally friendly method.

GK 20 ICT and Media Development City.

Our council again strongly mentions our objection to the use of the word "City". This may invariably give rise to the demonising of the villages of Kalkara and Xghajra. This is why the word "Centre" is more appropriate.

Mepa's support to regenerate the area of the former Ricasoli Industrial estate and its surroundings includes the Xghajra designated extensive adjacent area together with the St.Peters area. Our council whilst in favour of such regeneration, requests that the final document by Mepa clearly and distinctively mentions Xghajra's involvement.

Mepa's preparation of a master plan based on the vision "Gateway for ICT to Europe" must involve and include the active participation and consultation of the Xghajra and Kalkara Local Councils and should include all the "Planning Gain" available to the two respective Councils consequent to this development.

Mepa's submissions make no mention of "Storm Water Management" for Kalkara, St. Rocco, Ricasoli and especially Xghajra since these localities

- It is practice for ICT and Media Development business parks to be referred to as cities, since the acceptable land uses are more than just a workplace since they integrate a working and living environment. Examples include Dubai Internet City, Dubai Media City, Smart Villages (Egypt) , CyberCity (Jordan) and Media City UK.
- MEPA acknowledges that part of the area earmarked for the development of the ICT and Media Development City is located within Xghajra. Hence reference to the location of the ICT and Media Development City will be to both Xghajra and Ricasoli.
- Policy GK 20 requires the preparation of a master plan from the proponents of the ICT and Media Development City. MEPA agrees that the involvement of the local councils in the preparation of the master plan is crucial to the preparation of a successful master plan.
- The issue of planning gain will be dealt with during the processing of the relevant development applications.
- The impact of the ICT and Media

are mainly built along valleys or the likes. With the extensive planned development of the ICT Centre, and recreational grounds, the residential areas adjacent will invariably have redirected storm waters entering their roads and properties. This is already a problem in Xghajra and any increased development on the hillsides of the adjacent areas will increase this problem. Steps have to be taken to plan for this eventuality.

Relevant policies: GN 01, GS 07, GE 06, GD 03, 04, GK 21, 22.

The regeneration of the former Ricasoli Industrial Estate and the building of the ICT Centre which will be catering for hospitality, retail facilities, residential uses, lodging areas, etc and the effect of all these matters extending onto the Xghajra territory, locality and other nearby residential areas, are matters of great concern for us. Invariably all the public utilities necessary as a result of all this development will surely effect Xghajra and the St. Peters area. Mepa is to safeguard and ensure that the resultant need of the upgrading and new implementation of all public utilities such as water, drainage, electricity, telephones, storm water management etc, should be properly included and detailed as development conditions.

Xghajra Local Council requests that there should be building restrictions imposed on the developers of the ICT project whereby the minimum non development area within the project is clearly defined, bearing in mind that this is public land being exploited for commercial purposes.

GK 21 ICT & Media Centre Building Heights.

The question of allowable building heights within the ICT & Media Centre are of great concern and besides the criteria being considered by Mepa it is strongly suggested that building heights take into consideration the surrounding and nearby villages and hamlets. The Xghajra Local Council finds it rather unconvincing that building heights should be regarded on a flexible approach bearing in mind that within and adjacent to the ICT Centre there are restricted residential building heights in force. Further more Mepa needs to seriously consider the fact that the St. Rocco hamlet and the whole Xghajra residential area lie in and along valley beds. Any permitted taller building clusters adjacent to these areas such as being proposed by the developers and being considered by Mepa, could seriously distort the

Development City on storm water flows and the related mitigation measures need to be studied at both master plan and development application stages.

- All required services and utilities pertaining to the ICT and Media Development City need to be identified and catered for in the Master plan as required by policy GK 20.
- The same policy requires that “ the master plan should also make provision for energy saving measures, a high technical quality of buildings, high quality landscaping, public open spaces and public access”.
- MEPA agrees that the setting and context of the ICT and Media Development City needs to be taken into consideration when determining the appropriate building heights for the development. This issue is a requirement of the master plan advocated by policy GK 20 and also within the criteria of policy GK 21.
- It is pertinent to point out that the flexible approach principle was retained from the policy relating to the Industrial Estate building heights.

skyline and may positively appear to engulf such low lying villages.

Relevant policies: GS 07, GK 20, 22.

The concept of tall buildings being contemplated by Mepa with regards to the Ricasoli locations under provisions of Planning Policy-Floor Area Ratio and to urban design considerations was only approved in 2006. The area planned to be a strategic employment hub or not, should have been considered before the granting of building permits for residential purposes with restricted height limits in areas such as St. Rocco, Xghajra and similar adjacent areas.

GK 22 Public Utilities Provision

The re-siting of a Sewage/Waste Treatment Plant, away from the previously planned at Wied Ghammieq has only come about because of the proposed ICT Media Centre around the Rinella/Ricasoli area. The Xghajra Local Council requests Mepa to state in its documentations that the plans to shift the plant to a location on the south side of Xghajra are being done to accommodate the investors of the ICT project.

The site being now proposed lies within the Xghajra locality except a small part which protrudes outside the Xghajra area. Such a move has now shifted the negative effects of such a plant (which will cater for over 80% of the sewage of Malta from Bahar ic-Caghaq down to the south of Malta) from the Kalkara area to the Xghajra and adjacent areas. Such a strategic development needs to have a full Environmental Impact Assessment exercise in accordance to EU standards.

The Xghajra Local Council is being consulted by the Water Services Corp and the Ministry of Investments and IT. It is essentially being emphasized as part of this consultation process that the Xghajra Local Council is expecting that all the negative aspects of this plant i.e. Noise, Odours, Environment, Access to and from the site, Landscaping, Transport of Sludge, Redirection of the sewage inflow from Wied Ghammieq, the Effect on nearby Dwellings, Storm Water Management, Re Use of Treated

- Strategic employment hubs are preferred sites for the accommodation of tall buildings subject to a number of criteria and in consultation with the relevant authorities. Ricasoli is a strategic employment hub and therefore is one of the sites which may be considered for tall buildings.
- LN 204 of 2001 postulates that a sewage treatment plant (of the magnitude required to cater for 80% of Malta's sewage) should require an EIA.
- The issues relating to the siting and operations of the sewage treatment plant will be dealt with during the processing of the relevant planning application.

Sewage, The Distribution system of Water for Re use, the Upgrading of the Infrastructure and Public Utilities and a number of other relevant issues will be dealt upon and tackled to the satisfaction of all concerned. Xghajra Local Council requests that Mepa is actively involved in this exercise. It is also expected that as already publicly announced by the Minister concerned, that Xghajra will be compensated for this unexpected inconvenience brought about by the Development of the ICT Media Centre for which the Grand Harbour Local Plan is being amended.

The Xghajra Local Council by this submission requests Mepa to consider this matter and include it in its consultation process. The ICT Centre at Ricasoli cannot be progressed unless the resiting of the Sewage plant takes place, so we consider that the effect of the Sewage Plant on the locality of Xghajra is an integral part of the whole reason why Mepa is issuing an amendment to the Grand Harbour Local Plan.

Furthermore regarding the ICT Media Centre and the adjacent lands in Xghajra (part of the Grand Harbour Local Plan) the Xghajra Local Council proposes that the use of land for public areas should be a priority and safeguarded by Mepa and should include the maximum possible not commercially developed. The residents of the surrounding villages and hamlets and similar areas should be protected from any negative effects that such a Development project may ensue. The area to be developed is presently mainly Non-Urban open land including a magnificent natural coastline which is perhaps going to disappear and whatever beauty it now has will become an irreversible conclusion.

While employment and tourism orientated projects are of an economical importance, any "destruction" of our countryside and coastline is to be strongly avoided as these areas are just as important for our better living and environmental well being.

We believe that the "planning" part of Mepa should seriously take note of the "environmental" impact with special emphasis being "Better Sustainable Living" for us the citizens and residents of these areas. Mepa should re assure us that their involvement in the planning considerations of this huge project should safeguard and raise not only our "standard of living" but more importantly improve our "quality of living".

Finally the Xghajra Local Council kindly requests that we be consulted on

- MEPA takes note of this concern.

- Figure 23 identifies the boundary for the proposed ICT and Media Development City. The land in question is within the development zone as approved by Parliament in July 2006. GK 13, GK 04 (GHLP) and SMCO 01 (SMLP) relate to the areas outside the development zone which surround the ICT and Media Development City. GK 13 deals with the Rinella Recreational Area, the shoreline and public access, GK 04 with the rural conservation area and SMSE 04 with the strategic open space gap. The coastline falls under the aegis of GE01 and GK13 and is a site of scientific importance.
- MEPA takes note of these concerns.

	<p>all relevant matters which may affect our locality including those areas bordering on our peripherals. Our aim is to protect these residents and eventually be a source of consultation/information for them. We strongly believe that Mepa has a unique opportunity in this huge development project to take up a prime role which should first and foremost consider the environmental living of the people around the areas to be developed.</p>	
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