



PUBLIC CONSULTATION  
SUMMARY OF SUBMISSIONS AND RESPONSES

JULY 2015

Number	Receipts Dates	Representations	MEPA's Response
SPED 0001  Mr. John Abdilla	18-03-14	<p>Kull fejn ikun hemm <i>big construction site</i> u fejn hemm fabriki ta' kostruzzjoni – ssir qiegħa t'ilma, biex il-vetturi li johorgu ma johorgux trabijiet fit-toroq, kemm jista jkun. (e.z. Attard hdejn petrol station quddiem San Anton, Hal Far, Hal Farrug, t'Alla u ommu....)</p> <p>Isir incentiv biex jinbidlu l-aperturi għal <i>double glaze</i>. Jsiru iktar riklami ta informazzjoni u l'gid li nakwistaww bid-<i>double insulation</i> u <i>insulation</i> ohra (e.z. fis-soqfa). Incentiv u riklami dwar il-bio diesel, <i>used batteries</i>.</p>	<p>Policy 6.1 tindirizza din il-kwistjoni fuq livell strategiku.</p> <p>L-immanigjar ta' siti ta' kostruzzjoni huwa aspekk intrinsiku tal-kundizzjonijiet tal-permessi ta' l-izvillup.</p> <p>Policy 9.6 tindirizza l-emissjonijiet "greenhouse" u l-kapacita ta' Malta li tadatta għal tibdiel fil-Klima.</p>
SPED 0002  Mr. Chris Zahra	18-03-14	<p>Bengħajsa area is a strategic site allocating Bengħajsa area for industrial use as the local businessman need to be next to an important landmark that of Freeport for logistic aspects. I encourage MEPA to give the whole area for industry as both the construction industry and mostly the commercial industries such as marine, food supply to ships, minor services to ships, etc. using both in Freeport and Marsaxlokk Harbour in general.</p>	<p>Policy 12.4 seeks ensure the continuing efficient operation of the Harbours and Airport whilst minimising adverse environmental impacts by safeguarding land around the Bengħajsa area for Freeport related/industrial activities.</p>
SPED 0003	19-03-14	<p>A proposal for the possibility for the environmentally-sustainable redevelopment of</p>	<p>Policy 7.2 and 7.3 seek to promote the efficient use of resources including local stone, water and soil,</p>

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Perit Christopher Bongailas		existing quarries that are located outside Development Zone but within great proximity to residential areas or areas which may be sensitive to certain negative elements that may arise from uses related to the construction industry.	and manage waste in a manner that safeguards natural processes, and minimises impacts on cultural heritage, landscape and human health by Ensuring the phased extraction of minerals and restoration of quarries and identifying appropriate after uses for disused quarries particularly the development of solar farms as a support to Energy policy.
SPED 0004  Mr. Matthew Dimech  Sliema Local Council	27-03-14	The following points relate to the Locality of Sliema  1. No large scale development          2. No development on coast          3. Access to coast	The Plan distinguishes between different character areas within localities such as business hubs and residential areas and provides strategic policy guidance for the safeguarding of residential amenity by controlling the scale of development in these areas and concentrating larger developments within relatively smaller areas. In these latter areas, impacts from development will be assessed through detailed studies and mitigation measures will be imposed as necessary.          Spatial Objectives CO 1 and CO 3 address development on the coast and seek to prioritise uses which necessitate coastal location whilst safeguarding public access to the coast.

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		<p>4. No increase in density and building heights</p> <p>5. Zoning proposals</p> <p>6. Use of planning gain for regeneration</p> <p>7. More distributor roads</p>	<p>The strategic direction is to reduce the overall densities and set appropriate building heights.</p> <p>These are issues which will be dealt with in the local plan.</p> <p>Agreed in principle but these are decided on a case by case basis in the determination of planning applications.</p> <p>This is addressed in Policy TO 10.3.</p>
SPED 0005 Dr. Philip Hadcroft	27-03-14	A detailed review of the state of the regeneration of Birgu including a critical appraisal of the facade and shopfront guidelines and the balconies scheme. The submission makes a proposal for an audit of all balconies to ascertain the state of affairs.	The thrust of the SPED is to prepare conservation area action plans (Urban Objective 2.1)
SPED 0006 Dr. Philip Hadcroft	28-03-14	A detailed review of the state of traffic management in Birgu.	Traffic management issues in specific localities falls under the aegis of Policies TO 11.3 and UO 3.10.
SPED 0007 Dr. Philip Hadcroft	01-04-14	A detailed proposal for the delineation of recreational resources within and on the periphery of the locality.	The importance of recreational resources is dealt with in the SPED by Policies UO 3.7, 3.8, 3.9. A more area and locality based approach will be dealt with in the respective local plan.

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SPED 0008  Dr. Philip Hadcroft	02-04-14	The submission includes suggestions for a successful socio-economic and physical regeneration of the Cottonera area	The thrust of the SPED is to prepare conservation area action plans (Urban Objective 2.1)  Furthermore Birgu forms part of the Grand Harbour Area which is identified as a strategic node for urban regeneration (Urban Objective 1.2)
SPED 0009  Mr. Matthew Dimech	03-04-14	The Sliema Local Council proposes that Tower Road, The Strand, Tigne Seafront, Qui Si Sana Road and the Tigne tunnel, are no longer considered as residential/local streets, but start to be considered as distributory roads.	This is the remit of the competent authority for transport and will be considered within the framework of Policy TO 10. 3.
SPED 0010  Dr. Philip Hadcroft	03-04-14	The submission highlights the need to restore buildings and structures of historical and archaeological value. It proposes an audit of auberges, historical buildings, bastions and walls with the scope of acquisition and restoration.	The thrust of the SPED is to prepare conservation area action plans (Urban Objective 2.1)  Furthermore Birgu forms part of the Grand Harbour Area which is identified as a strategic node for urban regeneration (Urban Objective 1.2)
SPED 0011  Mr. Thomas Briffa	04-04-14	There should be zero tolerance for any building in ODZ.  Architects and building developers should not act as advisors to the government where the environment is concerned. Architects and developers are there to make money.  Building in ODZ is Not even justified for schools – Hospitals- churches –mosques-synagogues etc.	There is a sequential approach to development. Paragraph 3.1 of the SPED spells out the sequential approach to development since the sustainable use of land and sea resources depends on the efficient use of available space. In preparing policies, plans and programmes Government will adopt a sequential approach to the use of land where development should be guided <ul style="list-style-type: none"> <li>• firstly to the re-use of existing developed land and buildings (through change of use),</li> </ul>

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		Stop the destruction of virgin land, and leave some country side /open spaces to Maltese people.	<ul style="list-style-type: none"> <li>• secondly to re-development of existing developed land and buildings and</li> <li>• finally where no other feasible alternatives exist, to the use of vacant land.</li> </ul> <p>This sequential approach is being adopted in order to ensure that land take up in the Rural Area is considered as a last resort and where it is essential for the achievement of sustainable development.</p>
SPED 0012  Dr. Philip Hadcroft	07-04-14	This submission concerns housing and that there is no comprehensive information that takes stock of the quality of these vacant dwellings and quantifiably describes the issues that prohibit them from being readily available on the market.	<p>The thrust of the SPED is to prepare conservation area action plans (Urban Objective 2.1) Furthermore Birgu forms part of the Grand Harbour Area which is identified as a strategic node for urban regeneration (Urban Objective 1.2)</p> <p>Policies TO 8.1; 8.2 and 8.6 coupled with policies UO 3.2, 3.3 and 3.4 also deal with the issue of vacancy.</p>
SPED 0013  Dr. Philip Hadcroft	17-04-14	This submission deals with the vehicles of socio-economic growth and the importance of having a skilled educated workforce with an appreciation of more complex constructs such as intrinsic value of ecology, beneficial impact of sustaining the environment and the value of participation in a socially adaptive and multicultural society. The importance of the implementation of the SPED and	The scope of the SPED is to facilitate the implementation of the National Reform Programme which identifies relatively low educational attainment and skill levels of the Maltese workforce as one of the bottlenecks hindering sustainable levels of growth. In addition the NRP also identifies the main infrastructural bottlenecks which require attention including

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		the increase in the number of university graduates is highlighted.	education.
SPED 0014  Mr. Jonathan Camilleri	19-04-14	Further to your open call for proposals, I would like to suggest three ideas: Recycling of sewage for agricultural use Self sustainable buildings Increased use of biofuels	Policies TO 4.9; UO 4.3 and TO 9.4 address these three issues.
SPED 0015  Din I-Art Helwa	23-04-14	<ol style="list-style-type: none"> <li>1. SPED is not in line with legal requirements.</li> <li>2. The public consultation draft does not include policies or a reasoned justification. All it contains is a list of objectives, which are very similar to those published in 2012 by the previous administration in preparation for the Strategic Plan.</li> </ol>	<p>The Plan as drafted is fully compliant with the provisions of the law as it sets out very clear policies to achieve the Strategic Objectives. Each objective is implemented through a set of policy directions. The Plan also contains four maps which translate the policy into a spatial dimension. The Plan is also supported by an analysis of key issues which forms the reasoned justification for the policies contained in the Plan and a series of maps which set out the strategic direction for the different spatial structures.</p> <p>It is Government position to radically simplify the form and content of the Plan since it is creating the strategic spatial dimension for the implementation of a wide range of Government plans and policies and the detailed provisions aimed at taking forward land use and development aspects of the SPED will be set out in the lower tier planning documents.</p>

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SPED 0016 Mr. Albert Cauchi	23-04-14	We need more trees and green in built up areas. Just buildings and stone look bare. Green gives colour to the built environment.	The importance of recreational resources is dealt with in the SPED by Policies UO 3.7, 3.8, 3.9. A more area and locality based approach will be dealt with in the respective local plan.
SPED 0017 Din I-Art Helwa	23-04-14	<ol style="list-style-type: none"> <li>1. SPED does not conform to Section 51 of the current EDPA as it does not fulfill its requirements in terms of policies, not properly illustrated by diagrams as necessary and is not accompanied by explanatory memorandum giving a reasoned justification for each policy.</li> <li>2. The SEA should not have taken place since there are no policies, diagrams and policy justification.</li> </ol>	<p>The Plan as drafted is fully compliant with the provisions of the law as it sets out very clear policies to achieve the Strategic Objectives. Each objective is implemented through a set of policy directions. The Plan also contains four maps which translate the policy into a spatial dimension. The Plan is also supported by an analysis of key issues which forms the reasoned justification for the policies contained in the Plan and a series of maps which set out the strategic direction for the different spatial structures.</p> <p>It is Government position to radically simplify the form and content of the Plan since it is creating the strategic spatial dimension for the implementation of a wide range of Government plans and policies and the detailed provisions aimed at taking forward land use and development aspects of the SPED will be set out in the lower tier planning documents.</p> <p>LN 497 of 2010 stipulates that a Strategic Environment Assessment is to be carried out for plans and programmes which are prepared for</p>



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			town and country planning and landuse and set the framework for future development consent for projects. The SPED falls within this category of plans and subsequently a Strategic Environment Assessment was carried out.

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SPED 0018  Dr. Antoine Zammit	02-05-14	<ol style="list-style-type: none"> <li>1. There should be a discussion on peri-urban within the spatial structure.</li> <li>2. The Vision should be stronger, embrace quality/design quality within the Urban Area and refer to economically and socially dynamic hubs.</li> <li>3. In the analysis of issues there is no clear reference to roadmaps for the future and future scenarios are envisaged as a factor of current realities. Land supply is too quantitative and should embrace qualitative considerations including the value of land. – A question of quality, a question of value.</li> <li>4. There needs to be a qualitative appraisal of current building stock to qualify the quantitative appraisal on housing and land for jobs.</li> <li>5. Within Urban Areas, the issue of quality should go beyond density and should embrace streetscape and building heights. The issue of density is location specific and is not the main contributor to vacancy.</li> </ol>	<p>The spatial structure is dealt with in paragraphs 1.20 to 1.26. Whilst it is acknowledged that there are areas which are transitions between the Urban Area and the Rural Area the sequential approach to development in the Rural Area is set out in Policy RO 3.</p> <p>The Vision sets the targets to achieve a better quality of life; design issues which can assist in improving liveability are dealt with in Policy UO4.</p> <p>Land supply per se is dealt with quantitatively but the qualitative issues are dealt with in the sections dealing with thematic issues. Whilst the future scenarios are dealt with as projections of current trends it is the policies which internalise the value aspect.</p> <p>It is agreed that a qualitative appraisal is necessary. This aspect forms part of the provisions of policy UO 3.2.</p> <p>Agreed. Following UO 3.2 and 3.3 (appraisal of value of character, amenity and distinctiveness of urban areas and designation of sub-areas) the establishment of appropriate building heights and densities will take place as per policy UO 3.6.</p>

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		<p data-bbox="577 320 1191 419">6. There should be consideration to urban allotments/allotment garden to contribute to the intrinsic value of the Rural Area.</p> <p data-bbox="577 499 1191 563">SPED needs to promote flexible models that are based on the value of given assets.</p> <p data-bbox="577 608 1191 707">Certain objectives can be amended so as to be translated into more achievable targets rather than remaining vague/broad considerations.</p> <p data-bbox="577 751 1191 887">TO 1.6 The reduction of development densities should be directed towards areas which need the measure rather than being a blanket clause.</p> <p data-bbox="577 932 1191 1031">TO 1.7 There should be a discussion on the value of green space.</p> <p data-bbox="577 1075 1191 1211">TO 9.6 There should be a prioritization of energy reduction and conservation following which there should be a discussion on energy generation.</p>	<p data-bbox="1223 320 1839 419">The intrinsic value of the Rural Area and more so of open space within the Urban Area are the subject of policies TO 1.7; TO 5 and UO 3.7.</p> <p data-bbox="1223 499 1301 523">Noted</p> <p data-bbox="1223 788 1839 887">Agreed. Whilst the target is for an overall reduction in density this needs to be read with in conjunction with policy UO 3.6.</p> <p data-bbox="1223 967 1839 1031">The matter is dealt with paragraphs 2.21 and 2.22 and in the National Environment Policy of 2012.</p> <p data-bbox="1223 1110 1749 1134">The Energy Policy sets out the prioritisation.</p>

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		<p>TO 10/TO 12 Should include reference to the important inter harbour links.</p> <p>TO 11 Should include reference to a strategic assessment of park and ride locations.</p> <p>UAO 1 There should be regard to a transition among the different settlement typologies.</p> <p>UAO 2 The concept of transition areas should be identified at SPED level</p> <p>UAO 3 The need to re-evaluate existing streetscapes on the basis of urban design principles should be set out.</p> <p>UAO 4 New developments should enrich their existing context and allow for natural surveillance (outlook).</p> <p>General observation on Rural Area There should be a flexible model that interchanges amongst agricultural areas, green areas for</p>	<p>Policy TO 11.3 deals with this issue.</p> <p>This is dealt with in Policies TO 1.8 and TO 11.1</p> <p>This is a detailed matter which will be dealt with in the local plans.</p> <p>This is one of the characteristics of policy UO 2.</p> <p>This is covered by policy UO 3.2 and UO 3.6</p> <p>This is a detail which will feature in the policy guidance advocated by policy UO 4.1.</p> <p>Noted.</p>

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		<p>recreational purposes, and natural areas.</p> <p>RAO 4 Further coalescence of urban settlements should be prevented.</p>	<p>This is agreed to and is covered by RO 4.4.</p>
<p>SPED 0019</p> <p>Mr. Emanuel Vella et al</p>	<p>15-05-14</p>	<p>"Where a site was within the development zone and a form of permit was issued or payment was accepted by the government and the site is not an environmentally sensitive site, the site in question should be included in the development zone to ensure social justice and the right of enjoyment of property. This would avoid consequent court cases for compensation".</p>	<p>Policy UO 3.1 deals with the issue of land to be included or excluded within/from the Development Zone.</p>
<p>SPED 0020</p> <p>Mr. Tarcisio Barbara</p>	<p>21-05-14</p>	<p>Sites identified in the submission should be designated as zones for boathouses and beachrooms in the revised Local Plans.</p>	<p>This issue will be considered within the framework of the Coastal Zone and Marine Area policies.</p>
<p>SPED 0021</p> <p>Mr. Herald Bonnici</p>	<p>01-06-14</p>	<p>Request to review boundary of Kirkop to ensure a balance between development within the UCA zone and outside. The area in question borders the Urban Conversation Area (UCA) zone on one side and is at the limit of the development zone on the other side with country views.</p> <p>A good number of heritage properties located at Triq San Leonardu would be adjacent to new development which may be over three storeys high. The end result would be a distortion with part</p>	<p>This is a detailed matter which will be dealt with the respective local plan.</p>

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		<p>of the new development ill placed in an area that should be within the UCA zone. New development adjacent to UCA buildings should be subject to the same finishing conditions, eg. use of Maltese stone, wooden apertures, etc. This would ensure that the buildings would blend in more in totality.</p>	
<p>SPED 0022</p> <p>Mr. Joseph Micallef</p>	<p>08-06-14</p>	<p>Employment should not be as an indicator in planning or an objective in planning since in 2014 there were 7600 unemployed and 15000 foreign workers.</p> <p>The document has a positive push to build in the ODZ leading to urban sprawl.</p> <p>Today's lifestyle as well as the push for women to go out to work is fuelling a work from home or flexible working hours arrangement leading to an effective decrease in the employee per floor space ratio particularly in the service industry. Planning policies should help push in this direction (i.e. encourage work from home). This would help decrease the pressure on ODZ development e.g. by requiring less roads and car parks.</p>	<p>The scope of employment projections is to determine the need for employment space and ensure that there is adequate space.</p> <p>Paragraph 3.1 sets out the sequential approach to development making it clear that development ODZ is only a last resort.</p> <p>Planning policies such as Class 1(d) of the Use Classes Order, 2014, facilitate the implementation of such initiatives.</p>

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		<p>Given expected pressures on food production arising from climate change, Malta should start protecting the agricultural land it has and invest into upgrading the quality of poor agricultural land. Malta should work more to produce its own food.</p> <p>There are two closed hotels (one at Marsascala and another at Rabat (Verdala). Another one is planned for Smart City according to the model). Use of these hotels should be ensured before considering the building of new ones.</p> <p>The Malta-Gozo channel has been confirmed as Malta's first marine important bird area (IBA) in recognition of its international importance for two globally and one regionally threatened bird species. This includes Comino. The area should be protected from development.</p> <p>There should be no development in the Nature protection designations in the Maltese Islands Further a buffer zone should be included beyond the boundaries of such sites. The buffer zone should be appropriate to mitigate disturbances from development, noise and light pollution.</p> <p>Distinctive characteristics of Gozo are rightly given recognition. Various areas of Malta have their own</p>	<p>Policy RO 1.1 protects good quality agricultural land from development</p> <p>Paragraph 3.1 sets out the sequential approach to development making it clear that development ODZ is only a last resort.</p> <p>The area is a protected area. Proposed development needs to conform to assessment procedures required by law.</p> <p>Proposed development needs to conform to assessment procedures required by law. The drawing up of boundaries includes buffer zones.</p> <p>Distinctive areas in Malta are already identified and protected in the respective local plans.</p>

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		<p>distinctive characteristics which should be recognized such as Delimara peninsula, The North West coast of Malta including clay and sandy beaches, the Dingli- Mtahleb area, the Buskett ta' Zuta area, Wied Qirda, Wied Dalam.</p> <p>Till now little has been done to preserve Malta's identity especially as regard the Architectural style.</p> <p>The policy to develop abandoned buildings when / where development is necessary is a good policy, but likewise the Government should work to reinstate to nature abandoned buildings where appropriate. A perfect example is the abandoned pig farm in Comino.</p> <p>The T-ten network may be heading in a collision course with environmental issues if it goes beyond Xemxija.</p> <p>Gnejna, Ghajn tuffiegħa and Golden bay and surroundings are unique in there setting and should be protected from excessive development which will ruin their character. No further development should be allowed in that area.</p> <p>Water conservation is important and efforts should</p>	<p>Sites with specific architectural characteristics worthy of protection have already been scheduled. Others are pending consideration.</p> <p>Paragraph 3.1 of the SPED outlines the sequential approach which gives preference to existing buildings including abandoned ones.</p> <p>Development applications pertaining to the TEN-T network will be subject to the required environment assessment procedures.</p> <p>These areas form part of the terrestrial rural coast. Any development needs to conform to the policy framework set out in CO 1.1b and CO 3.3 and the policies of the North West Local Plan.</p> <p>Noted. The SPED makes several references to</p>



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		<p>be made to collect rain water and not channel it to the sea.</p> <p>Permitting development of residences next to facilities such as LPG filling station at Qajjenza, within firework factory's safety zones, farms gave rise to conflicts and hence initiatives for the relocation of such facilities. Before relocation other controls should be considered. E.g. technological such as vapour traps in petrol stations.</p> <p>It is unclear why the SPED wants to designate business hubs in Marsalforn and Xlendi. Is not one business hub sufficient for Gozo (i.e. Rabat)?</p> <p>Implementing of a cruise liner terminal, airfield and yacht marina on such a small island would work against Gozo's character and distinctiveness. The drive for commercializing Gozo is too strong for such a small island which a short time back was identified with an Eco Island policy. It is unclear how these developments have been identified as strategic.</p>	<p>water conservation measures.</p> <p>Noted</p> <p>The commercial and tourism zoning identified in the Gozo and Comino Local Plan have now been harmonized into one designation – business hubs. The scope is to identify areas where specific business uses may be located.</p> <p>These specific projects are intended to improve accessibility and economic diversification of Gozo. The challenge is to ensure that the character and distinctiveness of Gozo are not significantly affected. These projects are strategic to Gozo.</p>

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SPED 0023  Dr. E. Cefai	16-06-14	<p>The submission is a detailed exposition of what the SPED should include. It proposes to changing the orientation of the SPED with the following primary aims</p> <ol style="list-style-type: none"> <li>1. To permit relatively small development outside residential areas linked with the condition of improving the immediately surrounding environment on the same site</li> <li>2. To link large scale development outside residential areas with jobs</li> <li>3. To link any development outside residential areas with social purposes like housing, recreation, health, education.</li> <li>4. To make corrections to existing schemes for ensuring Justice and remedies for injustices</li> <li>5. To liberalise development without ignoring the maintenance of the environment</li> </ol>	<p>Paragraph 3.1 of the SPED sets out the guiding principles for the consideration of development. The emphasis is to re-use or regenerate existing buildings rather than developing new ones ODZ. Changes to the Development Zone boundary are subject to the provisions of Policy UO 3.1.</p>
SPED 0024  Mr. Maurice Vella	17-06-14	<p>SPED is thorough and well presented. However its presentation makes it very difficult to read.</p> <p>The following comments were made:</p> <ol style="list-style-type: none"> <li>a) Whilst the key issues section is unambiguous in presenting the problems facing sustainable development it should be noted that the lack of</li> </ol>	<p>Noted</p> <p>UO 4.6 seeks to integrate good access in the design of buildings and facilities.</p>

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		<p>good access to places and services is mentioned.</p> <p>b) The employee to floorspace ratio for industry is deemed to be high.</p> <p>c) Thematic Objective 1 There should be a stronger emphasis on using existing property. The serious detrimental effect of tall blocks of apartments in appropriate locations should be addressed. There should be a sequential approach to ensure that recycling of land and property is the first option. There is a serious lack of open space.</p> <p>d) Thematic Objective 7 should make a stronger emphasis on waste as a resource</p> <p>e) Thematic Objective 8 is too long and should be split into two objectives</p> <p>f) Thematic Objective 9 should place a stronger emphasis on local community generation</p> <p>g) Rural Objective 3 should engage in meaningful community engagement when this policy is being applied</p>	<p>The ratio was developed by Malta Enterprise on the basis of a survey of the employee to floorspace ratios of existing industrial facilities</p> <p>This emphasis is laid out in paragraph 3.1 of the SPED which sets out a sequential approach to development. Policies UO 3.2; 3.3 and 3.6 together with detailed policy guidance deal with the issue of appropriate locations for tall buildings.</p> <p>The lack of open space is acknowledge in the discussion of issues and tackled from a policy point of view in policies TO 1.7; TO 5 and UO 3.7 amongst others.</p> <p>The Waste Management Plan takes forward this concept in more detail.</p> <p>Noted.</p> <p>This issue is tackled in more detail in the relevant sectoral policies.</p> <p>The statutory consultation requirements as laid out in the EDPA of 2010 and the upcoming legislation refer.</p>

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SPED 0025  Floriana Local Council (Mr.Godwin Azzopardi)	19-06-14	The following submission refers specifically to Floriana Local Council Area. <ol style="list-style-type: none"> <li>1. Loss of population to offices</li> <li>2. Poor housing</li> <li>3. Lack of new build</li> <li>4. Transport, traffic and parking problems</li> <li>5. Air pollution problems</li> <li>6. Regional homes for elderly</li> <li>7. Floriana as a special focus area for social facilities</li> </ol>	Floriana is part of the Grand Harbour Regeneration Area (policy UO 1.2). This designation has the scope of regenerating the social and physical fabric of this area. This will tackle the physical and social problems indicated in the submission by the Local Council.

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SPED 0026  Dr. Ian Stafrace	19-06-14	<p>The Mriehel area has developed in a hub providing accommodation to major, if the the major, financial and service provision stakeholder on the Island.</p> <p>One cannot consider the area as being limited to the confines as contained in Map BKM 2 of the Local Plan. The area which is in the immediate proximity of the said zone and which houses the head offices of the two major Maltese Commercial Banks must likewise be assessed. Such an assessment should easily determine that this area should be a catalyst for the further development of the market service industry.</p> <p>The whole of the Mriehel Area should be permitted to regenerate and develop and accommodate Market Service Operators through the provision of offices, data and logistics and similar uses which are in line with the objectives of the SPED.</p>	Mriehel is identified as an Enterprise Hub by the SPED.



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		<p>4. Does not promote sustainable development</p> <p>5. Has no reference to education, training and public awareness</p> <p>The KA disagrees that Government retains an overriding right.</p> <p>The SPED is an inadequate replacement to the Structure Plan.</p>	<p>Sustainable development is a cornerstone of the SPED and is enshrined in the General Principles in Paragraph 3.1</p> <p>The role of the SPED is to set the spatial dimension of national plans and policies. Education, training and public awareness are tackled in relevant national plans and policies.</p> <p>The overriding right is enshrined in the EDPA 2010 and was replicated to set out the complete context in the General Principles.</p> <p>See response to part 3.</p>
<p>SPED 0028</p> <p>Dr. E. Cefai</p>	<p>20-06-14</p>	<p>SPED should reflect these additional aims and the spirit of these additional aims is basic to any part, any line, of SPED.</p> <p>SPED should be</p> <ol style="list-style-type: none"> <li>1. Flexible</li> <li>2. Fair and equitable</li> <li>3. Attempt at all times and in an ever-continuous way to make landowners economically equal beneficiaries from their lands</li> <li>4. Attempt at all times and in an ever-continuous</li> </ol>	<p>The raison d'être of the SPED is to act as enabling plan to increase the competitiveness of the Maltese Islands in a manner where socio-economic development assists the achievement of national environment objectives. As a national strategic document, the SPED guides the spatial aspect of Government sectoral policies, plans and programmes, including those emerging from the EDPA. Paragraph 3.1 sets out the Guiding Principles of the Plan.</p> <p>Changes to the Development Zone boundary are</p>

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		<p>way to make maximum economic profitability from every inch of land private and public</p> <p>5. On a day to day basis continually change policies in line with and as subject to the immediately above in response even to a single individual private request or application</p> <p>6. Just (Justice) – in a way to economically compensate every person having a legal proprietary interest in land and to do so even to the least inch of land in Malta and Gozo</p> <p>7. Open – especially in relation to relatively small inclusions of land in the development schemes/zones</p> <p>8. Good Feel – in which any land stakeholder is made to feel good and not be disappointed in any way</p> <p>9. Equally Distributive – policies and schemes should be made in a way to ensure to everybody equal economic wealth and profitability from any land use</p> <p>10. Continuous Negotiation with the Respective Landowners</p> <p><b>Additional Aims</b></p> <p>1 To ensure that the protection of the environment is not just control over land building development but more important issues like air pollution, noise,</p>	<p>subject to the provisions of Policy UO 3.1.</p>



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		<p>traffic and so on</p> <p>2 To ensure that policies as much as possible not site specific but use-related according to criteria (please see parts of previous Submissions)</p> <p>3 To consider all parts of the existing land of Malta and Gozo as all qualifying candidates for one or other uses and/or activities all and each of roughly equal economic profitability and income</p> <p>4 To list an ever-growing list of economically equal in profitability and income uses and/or activities in a way that every land in the Maltese Islands qualifies at least for one of these uses. Where according to the criteria the land qualifies for one than one such use, it shall be at the option of the landowner to choose.</p> <p>5 To ensure that policies that – without harming the environment – are issued to render the lands of each landowner as with equal economic profitability and income - such policies to be issued in ever-increasing mode in ever-continuous furtherance of this aim.</p> <p>6 To ensure that where land is not covered for development and/or economically profitable</p>	

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		<p>equivalent use by inclusion in a scheme, then such development and/or economically profitable equivalent – shall be covered by the promulgating of new policies for the purpose</p> <p>7 To list an ever-growing list of sites that are candidates for one or the other of these economically equally profitable uses (e.g. a site may not qualify for a block of flats but it shall qualify as a tourist complex, hotel, or even large-scale agricultural undertaking or warehouse storage or obnoxious uses as fireworks factory or disco )</p> <p>8 To ensure that any person with a legitimate interest in the private land area of the Maltese Islands be satisfied and never be disappointed in an economic sense and to consider this an an Extrinsication or at least extension of a permanent fundamental human right</p> <p>9 To eliminate inequalities in economic profit from land use between one landowner and another.</p> <p>10 To classify all land areas in the Maltese Islands as each and every one qualifying for at least one (or more) development and/or economically profitable equivalent uses and utilization.</p>	

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		11 To allow landowners to apply for the change of use any land at any time and such change of use shall be always favorably accepted either in the short term or in the longer term (such term to be negotiated between the respective stakeholder/s in the land and the Authorities).	
SPED 0029 Dr. E. Cefai	20-06-14	LP 2013-2679 -Tal Papa, Tal Papa Road, Birzebbugia, Malta	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0030 Dr. E. Cefai	20-06-14	LP 2013-3101 - Tal Imhammed, Marsaxlokk Road and/or more correct access	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0031 Dr. E. Cefai	20-06-14	LP 2013-2948 – Il Mielha Marsalforn, environs of Xaghra Road et and/or more correct access, limits Xaghra Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0032 Dr. E. Cefai	20-06-14	LP 2013-3304 - Santu Rokku, Triq San Rokku et Kalkara, Malta (Smart City Area)	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0033 Dr. E. Cefai	20-06-14	LP 2013-3303 - Tax Xlendi, Xlendi Road et, Xlendi Bay, limits of Munxar Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0034 Dr. E. Cefai	20-06-14	LP 2013-2676 – Ta' Abdilla, Dahla ta Abdilla, Gharb Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.

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SPED 0035 Dr. E. Cefai	20-06-14	LP 2013-2949-Tal Ghaqba, Naxxar, Malta	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0036 Dr. E. Cefai	20-06-14	LP 2013-2869 – Ta Srug, off Triq is Srug, and/or more correct access, Xaghra, Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0037 Dr. E. Cefai	20-06-14	LP 2013-2792 – Tal Ghaqba, Sqaq it Twil and/or more correct access, Siggiewi, Malta	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0038 Dr. E. Cefai	20-06-14	LP 2013-2927 – Ta Dbiegi, by Ta Dbiegi Estate, Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0039 Dr. E. Cefai	20-06-14	LP 2013-3031 – Tal Wicc, Marsaxlokk, Malta	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0040 Dr. E. Cefai	20-06-14	LP 2013-2926 – Tal Ghasri sive Ta Ghammar, Ghammar Street et, Ghasri Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0041 Dr. E. Cefai	20-06-14	LP 2013-3229 - Tal Hluq/Tal Milied, Triq tal Hluq et, Zebbug, Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0042 Perit Ondre Camilleri-Gaglione	20-06-14	Request that land at Tal-Brag be retained as envisaged in North West Local Plan, in accordance with Map 25 of the Rationalisation Exercise of 2006 confirming that upon inclusion of the Tal-Brag land within the NW Local Plans, it would be transferred to the owners of Lands at Tas-Sellum as compensation.	Requests for land to be retained within the Development Zone will be considered during the Local Plan review.

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SPED 0043 Ms. Maria Borg Filletti (NCPE)	20-06-14	Equality mainstreaming should be applied in the design, planning and implementation phases of the creation and transformation of spaces.	The SPED makes proposals for the future spatial distribution of development and the protection of the environment on land and sea in a manner that is consistent with national policies and integrates Government's social, economic and environmental objectives.
SPED 0044 Dr. E. Cefai	20-06-14	Additional justifications for land submitted for inclusion within the development zone.	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0045 Dr. E. Cefai	20-06-14	LP 2013-2788/2790 – Ta Hajt il Wied, Valley Street et, Zejtun, Malta	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0046 Dr. E. Cefai	20-06-14	LP 2013-2793/2794 – Tal Wieri, Sdieri Street et, Gharb, Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0047 Dr. E. Cefai	20-06-14	LP 2013-2677/2678-Ta Ghiddu, Sqaq il Qbiela, Bahar ic Caghaq, limits of Gharghur, Malta.	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0048 Dr. E. Cefai	20-06-14	LP 2013-2673 – Tas Seqer, Gharb Road, and/or more correct access, Gharb, Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0049 Dr. E. Cefai	20-06-14	LP 2013-2929/2947 – Il Mejda ta' Kassja Marsalforn off Marsalforn Road et limits Zebbug Gozo	Requests for inclusion of land within the Development Zone will be considered during the Local Plan review.
SPED 0050 Mr. Antonio	20-06-14	1. SPED should provide specific direction on DOs and DON'Ts to avoid misinterpretations	The SPED sets the strategic direction for subsidiary plans and policies.

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Anastasi (Flimkien ghal Ambjent Ahjar)		<p>2. There should be Planning Gain in the form of social housing</p> <p>3. Energy efficiency legislation should be enforced</p> <p>4. Ownership issues preventing sale of property should be resolved through legislation</p> <p>5. Introduce concept of shared spaces especially in UCAs</p> <p>6. New school in Qawra should not be built on recreational space</p> <p>7. Support for town centre concept</p> <p>8. Centralised car parking areas</p>	<p>Planning Gain and other incentives from planning permits can take different forms.</p> <p>Noted and agreed.</p> <p>The implementation of the SPED requires changes to legislative, administrative and regulatory provisions.</p> <p>The preparation of Conservation Area Action Plans will include such spaces where applicable.</p> <p>Schools are space demanding uses which are difficult to locate. The principles in Paragraph 3.1 shall apply for the location of new schools.</p> <p>SPED has taken forward this concept through the business hubs identified in UO 1.5.</p> <p>Policy TO 1.8 and Objective TO 10 and TO 11 will include measures for park and ride facilities.</p>
SPED 0051  Mr. Michael	20-06-14	<p>1. Lack of census data</p> <p>2. Vacancy issue needs to be studied further</p>	<p>The census data for 2011 was available and used in the preparation of the 2014 draft.</p> <p>Agreed</p>

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Stivala (Malta Developers Association)		<p>3. Reducing development potential is unjust and increases uncertainty</p> <p>4. Problems of Gozo not addressed</p> <p>5. Policy preparation process is too fast</p>	<p>Development density reduction can take place in various ways.</p> <p>The section dedicated to Gozo in the SPED identifies the spatial requirements to implement National socio-economic and environment policy.</p> <p>The plan preparation process fulfilled the legal requirements as stipulated in the EDPA, 2010 including extensive public consultation. The preparation and adoption process spanned a period of 4 years which is deemed more than adequate.</p>

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SPED 0052  Mr. George Camilleri (Din L-Art Helwa)	20-06-14	<ol style="list-style-type: none"> <li data-bbox="584 320 1196 384">1. SPED is not valid and does not fulfill expectations.</li>   <li data-bbox="584 751 1196 783">2. SPED is out of line with the legal requirements.</li>   <li data-bbox="584 863 1196 959">3. It is unacceptable that the objectives issued in 2012 are now presented as the full Strategic Plan.</li>   <li data-bbox="584 1182 1196 1318">4. Din L-Art Helwa requests that both the SPED and the Local Plans that are currently being revised are both approved by the House of Representatives.</li> </ol>	<p data-bbox="1218 320 1832 703">The Plan as drafted is fully compliant with the provisions of the law as it sets out very clear policies to achieve the Strategic Objectives. Each objective is implemented through a set of policy directions. The Plan also contains four maps which translate the policy into a spatial dimension. The Plan is also supported by an analysis of key issues which forms the reasoned justification for the policies contained in the Plan and a series of maps which set out the strategic direction for the different spatial structures.</p> <p data-bbox="1218 751 1832 815">The SPED fulfills the requirements of the EDPA, 2010.</p> <p data-bbox="1218 863 1832 1134">It is Government position to radically simplify the form and content of the Plan since it is creating the strategic spatial dimension for the implementation of a wide range of Government plans and policies and the detailed provisions aimed at taking forward land use and development aspects of the SPED will be set out in the lower tier planning documents.</p> <p data-bbox="1218 1182 1832 1246">The SPED and subsequent revisions will be considered by the House of Representatives.</p> <p data-bbox="1218 1541 1832 1596">The SPED was ratified by Parliament. The EDPA of 2010 does not contemplate parliamentary</p>



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		<p>5. Din L-Art Helwa maintains that the Spatial Strategy should be endorsed by the House of Representatives, as in the case in the current legislation for the SPED and as was the case for the Structure Plan, and not by the Minister.</p> <p>6. The 5 year constraint should also be maintained in order to provide some stability.</p> <p>7. The SPED and any subsequent document should in no way increase the development zones or threaten further the nature of the ODZ.</p> <p>8. The SPED should guarantee to the public that no increase in the Development Zones will be permitted in any subsidiary plans.</p> <p>9. ODZ areas require a high level of protection and should be given increased importance in the SPED document.</p>	<p>The Spatial Strategy will be endorsed by the House of Representatives.</p> <p>This aspect is being discussed in the consideration of the new Planning legislation.</p> <p>Paragraph 3.1 sets the sequential approach for development whilst Policy UO 3.1 requires that any changes to the Development Zone are not significant and be subject to parliamentary consideration.</p> <p>Changes to the Development Zone boundary have to take place through a SPED review.</p> <p>Agreed. Paragraph 3.1 and Objective RO 3 set out the parameters for development.</p>

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SPED 0053  Building Industry Consultative Council	20-06-14	<ol style="list-style-type: none"> <li>1. SPED did not make reference to               <ol style="list-style-type: none"> <li>a. Vision 2020 – Pjan ta' Zvilupp Regionali ghaz-Zona tal-Port il-Kbir</li> <li>b. Influx of foreign workers</li> <li>c. Projected increase in number of tourists visiting Malta</li> <li>d. Possibility of LNG piped system to serve industrial areas and heavily populated areas</li> </ol> </li> <li>2. Disagreement with statement that building car parks within UCAs would damage historic fabric</li> <li>3. Increase in building height only in committed streets</li> <li>4. All localities to have low density zones</li> <li>5. Redundant primary schools in centres to be developed for old people homes</li> <li>6. Mass transit system in densely populated areas</li> <li>7.</li> </ol>	<p>This plan was never adopted as Government policy.</p> <p>The SPED's remit was to prepare the spatial dimension for employment in Malta irrespective of the origin of workers.</p> <p>No forecasts for tourist arrivals were available.</p> <p>The SPED sets the framework for the facilitation of infrastructure.</p> <p>Car parks within UCAs are not ideal since this would increase traffic movements and associated air and noise pollution in restricted areas hence affecting the quality of life of the residents.</p> <p>The strategic direction is to decrease densities and set appropriate buildings within this context.</p> <p>Urban Objective 3 sets the context for the identification of different character areas.</p> <p>Policies TO 2.2 allows this to take place.</p> <p>Objective TO 10 and TO 11 set the framework for public transport systems</p>

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		<p>7. Marsa quays not to be used for cargo handling</p> <p>8. All localities should have area for light industry</p>	<p>Policies TO 12.1 and TO 12.3 set the context for the use of space within the Grand Harbour. However cargo handling is a legitimate port use.</p> <p>At a national level there is adequate space for micro-enterprise parks.</p>