

[REDACTED]
Planning Authority
St. Francis Ravelin
Floriana, FRN 1230

11th January 2018

Dear [REDACTED]

**Partial Review of the Grand Harbour Local Plan (2002), Marsa Park Site (Policy GM15) Final Draft (September 2017)
Consultation in terms of Regulation 4(6) of S.L. 549.61 (Strategic Environmental Assessment Regulations)**

Reference is made to the Planning Authority's consultation on the Partial Review of the Grand Harbour Local Plan, Marsa Park Site Policy GM15 Final, dated September 2017, which the Environment and Resources Authority (ERA) received by email on 7th December 2017.

ERA has reviewed the information provided with your SEA screening consultation and considers that, strategically, the proposed partial revision to the Grand Harbour Local Plan of 2002 at Marsa Park Site is unlikely to have significant environmental effects, particularly if the environmental recommendations highlighted below are taken into account. Moreover, depending on the scale, nature and operation of the specific projects, proposals within the site may also require further environmental assessment, including an Environmental Impact Assessment (EIA) screening procedure in terms of S.L. 549.46 (EIA Regulations, 2007), and possibly environmental authorisation from ERA.

The partial review of the 2002 Local Plan is proposing an increase in building heights and notes that the FAR policy may also be applied in this area. In its previous comments, dated 11th January 2017, ERA highlighted that the proposed increase in the developable floorspace of the area could have consequential impacts, such as traffic-related environmental impacts relating to pollution. It was therefore recommended that detailed evaluations of each proposal are considered thoroughly during each individual development application process. Furthermore, the proposed amendment to policy GM15 would result in the development of existing undeveloped and green open spaces characterised by mature trees in the area, and which: (i) contribute to urban biodiversity, including birds; (ii) act as urban "green lungs" through ecosystem services such as air purification; and (iii) have potential for public green space for recreation.

These environmental considerations are important for the sustainability of the area, particularly noting the strategic location of the site within Malta's conurbation and its proximity to busy arterial roads. However, the current provisions for landscaping and public



open space in the proposed Local Plan review need to be amended in order to ensure that future development at this site contributes towards the environmental improvement of the area in a tangible manner. ERA notes that the designated Landscape Areas in Map 1, which are to be soft landscaped to improve their green appearance, are adequate but only consist of roundabouts and traffic islands (or similar). However, the landscaping requirements and specifications for the additional areas which need to be allocated as landscaped open space in any design scheme and which should not be less than 20% of the gross developable footprint, as interpreted in this local plan revision, are less clear and leave leeway for interpretation. Significant parts of these areas could still end up paved or hardsurfaced.

Therefore, ERA recommends that criteria iv. of Policy GM15 Marsa Park Development Area should be revised to clarify that the additional areas of land of not less than 20% of the gross developable footprint in any design scheme shall be soft landscaping with dense vegetation and adequate tree and soil coverage, with the aim of improving the green appearance of such public areas and the urban biodiversity of this highly congested and developed area. Moreover, any additional open space which would need to be provided as a result of the application of the FAR policy, should also seek to contribute to the above. These recommendations contribute to the achievement of SPED *Urban Objectives 3.7 and 3.8* which aim to *“protect and enhance the character and amenity of distinct urban areas”*; Target 2 of the EU 2020 Biodiversity Strategy which aims to *“maintain and restore ecosystems”* and their services by the use of green infrastructure; and measures EN4 and SI6 of the National Biodiversity Strategy and Action Plan (NBSAP) (see below).

National Biodiversity Strategy Action Plan (NBSAP 2012-2020)	
Theme 3: Ecological Network of Protected Areas – Code EN4	Components for building a green infrastructure (as a holistic framework for resource planning and conservation) are strengthened to improve the ecological coherence of Natura 2000, via integration into the broader landscape, and hence to curb habitat fragmentation, improve adaptation to climate change and aid in integrated flood management (links with EN2 and EN3).
Theme 18: Other Sectoral Integration – Code SI6	The role and importance of spatial planning as an instrument for wider biodiversity conservation is reflected in new policy on spatial planning. The latter builds on the principles of integrated land use planning and devises measures to safeguard the wider countryside from urban sprawl, to support urban biodiversity and to contribute towards the EU priorities on a Green Infrastructure (links with EN4).

Yours sincerely,



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 Environment and Resources Authority