

Annex 1

ERA Feedback on the Partial Review of the Ta' Qali Action Plan (Phase 3)

October 2020

1. Introduction

The Environment and Resources Authority (ERA) welcomes the opportunity to comment on phase 3 of the Partial Review of the Ta' Qali Action Plan.

ERA considers that its comments provided during Phases 1 and 2 are still valid and are being reiterated, including those concerning noise and air quality. Additional comments regarding the specific revisions indicated in the consultation document are provided in the following section.

These comments are provided without prejudice to ERA's review and comments on any eventual development projects that may emerge from the Development Brief, when more detailed environmental assessment will be required. Depending on their nature, scale and context, proposed projects may also require different types of environmental assessments or other related screenings, including Environmental Impact Assessments (EIA) or other screenings, as may be relevant.

ERA welcomes the amendments made during Phase 3, such as the requirement of 40% open space for the comprehensive development areas, as they are generally positive from an environmental perspective. Nevertheless some issues are being highlighted in the next section.

2. Main environmental issues

Reference to the Landscaping section on page 9: ERA suggests making specific reference that the trees and shrubs should preferably be indigenous species. As already indicated in the Sustainability section, and also noting the Government's ongoing impetus on Green Infrastructure (GI), ERA feels that the review of this action plan offers an opportunity to showcase the integration of GI in the commercial/industrial dimension. Proposals for specific GI features which could be included are provided in Annex I.

According to the Phase 3 amendments, 11,360 m² is now being dedicated to open space, of which only 2,218 m² will be allocated to landscaping. This landscaping buffer has been limited to the edge of the Comprehensive Development Area only. It is recommended that landscaping elements are included throughout the open space. Furthermore, in order to mitigate visual impacts onto the adjacent ODZ/rural area, it is recommended that the landscaping buffer should be reintroduced around all the site, including at the edge of the Conventional Development Area, whenever possible, or where redevelopment of any site within is proposed.

It is noted that reference to the minimum width of 13m of the landscape buffer has been deleted. In this regard it is unclear what the width of the proposed landscaping buffer should be. It is recommended that the revised policy should be amended to reinstate the minimum width of the landscaping buffer of not less than 13m.

It seems that the revision is also indicating an intent to widen Triq L-Idwart, resulting in additional take-up of adjacent ODZ/rural land. In this regard, it is important to ensure that all future development and related interventions, including the entire width and extent of roads/service roads, access, pavements, footpaths, etc., should be contained within the existing boundary of the Ta' Qali Commercial Area.

4. Conclusion

ERA looks forward towards additional consultations, and remains available for any clarification, or further consultations via: era.policy@era.org.mt

Annex I – Green Infrastructure

1. The proposed new roadway to pass through the centre of the zone, to be constructed of pervious material. This will allow optimal water drainage from the road, thus minimising water retention and flooding. Water from the roadway would be directed and stored in an underground cistern to be used for irrigation.
2. The landscaping strip proposed in the new roadway to pass through the centre of the zone, would benefit from being shifted from the middle of the roadway to the side of the road, thus acting as a separator between traffic and the walkway rather than as a separator between the car lanes (Fig. 1).



Figure 1: Suggested shifting of the landscaping strip to the side of the roadway.

3. ERA suggests that the landscaping strip/s are designed and implemented in the form of rain gardens (bioswales), which would act as a water collecting device from the roadway and the walkway, whilst being aesthetically pleasing (Fig. 2). The water collected would



Figure 2: Design of possible implementation of a bioswale 'rain garden' at the identified location

be directed and stored in an underground cistern to be used for irrigation.

4. The proposed walkway itself could be designed as a permeable pavement, with the implementation of permeable paving as indicated in Fig. 3 & 4. This would add to the green element in the area whilst



Figure 3: Mixed concrete paving and grass to enhance permeability aiding in rainwater storage.

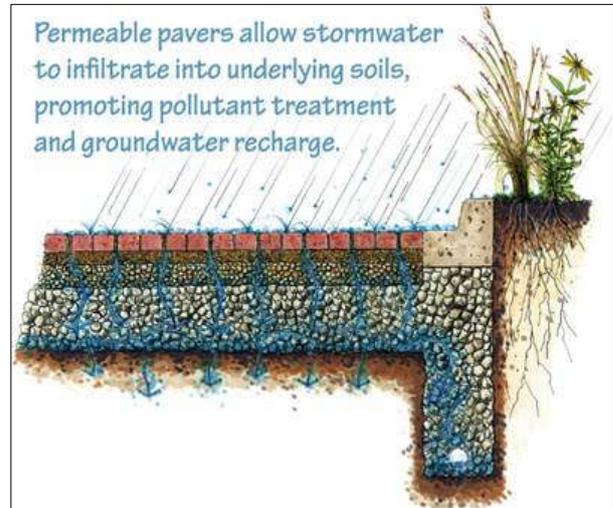


Figure 4: Cross-section of possible implementation of permeable paving in the walkway.