

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

10th June 2021

Dear [REDACTED]

**Partial Review of the SMLP (Marsa Industrial Area Policy SMMR01) and the CMLP (Imriehel Industrial Area Policy CG14 as amended by PC 0057/10 of 2012) (March 2021)
Consultation in terms of Regulation 4(6) of S.L. 549.61 (Strategic Environmental Assessment Regulations)**

Reference is made to the Planning Authority's (PA) consultation on the Partial Review of the SMLP and the CMLP (March 2021), which the Environment and Resources Authority (ERA) received by email on 13th May 2021. ERA has already provided comments on the draft policy, dated January 2021, which are being included in Appendix 1 for your perusal.

ERA has reviewed the information provided with your consultation and considers that strategically, the proposed revisions to Policy SMMR01 of the SMLP and Policy CG14 of the CMLP, are unlikely to have significant environmental impacts. However, depending on the scale, nature and operation of the specific projects, proposals within these sites may also require further environmental assessment, including an Environmental Impact Assessment (EIA) screening procedure in terms of S.L. 549.46 (EIA Regulations, 2017), and possibly environmental authorisation from ERA.

Yours sincerely,



Perit Michelle Piccinino
Chief Executive Officer
Environment and Resources Authority

Appendix 1

ERA Feedback on the Partial Local Plan Reviews - Imrieħel and Marsa Industrial Parks (Phase 2)

January 2021

1. Introduction

The Environment and Resources Authority (ERA) welcomes the opportunity to comment on the Draft Partial Review of the South Malta Local Plan (2006) and the Central Malta Local Plan (2006) – Imrieħel and Marsa Industrial Parks (Phase 2).

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.

2. Main environmental issues

- i. ERA notes and welcomes the proposed urban design parameters that are to be used as guidance for the assessment of building heights. However, there is still a concern that the absence of numeric building height limitations and open-ended parameters for the concerned areas could result in much higher buildings and development densities than those currently planned. Unsustainable development densities may have consequential impacts on the environment, particularly for sites at the edge of the site boundary, such as those associated with road congestion and overloading of infrastructure, and particularly with ensuing pressures for construction or widening of roads, or other infrastructural interventions beyond the industrial area. To this effect, ERA reiterates its comments made during phase 1, with specific emphasis on the negative impacts of increased traffic flows which will exacerbate in these areas. ERA's previous recommendation that development at these locations should take in consideration existing vehicular traffic flows, as well as for the introduction of appropriate air and noise abatement procedures and measures, are being reiterated.
- ii. Moreover, determining building heights on the basis of such open-ended parameters would rely heavily on a case-by-case assessment at project-level, which could result in haphazard building heights and development densities. It is suggested that clearer and more prescriptive criteria are included, in accordance with an agreed vision for these areas. These criteria should take into account the carrying capacity of the area, the developments at the edge of the site boundaries and their associated environmental impacts, such that these are minimized at source.

It is recommended that the policies should encourage a smooth transition between existing buildings in the immediate vicinity of the concerned areas and the industrial parks. ERA suggests that the height of buildings should be stepped up in a moderate transition from the height of buildings in the immediate vicinity of Area A at Imrieħel and the existing industrial building heights at the edge of the Marsa Industrial Estate

to moderately higher buildings at the centre of these sites, without resulting in unsustainable development densities and significant visual impact on surrounding low-lying areas and distant rural views.

- iii. The proposed Local Plan revisions also offer an opportunity to replace the existing infrastructural facilities at these sites (e.g. overhead wiring, substandard sewers or culverts) with more environmentally and aesthetically considerate alternatives. In this regard, the infrastructural capacity and facilities of the area should be duly factored into the advance planning of the scheme.
- iv. The draft revised policies SMMR 01 and CG 14 do not make provision for the creation of strategically located green open spaces. Sufficient and suitable land within both sites should be provided for implementing green open space and soft landscaping. For example, the requirement for provision of adequate green open space could be tied to development permits for larger sites, whereby a percentage of the site area is dedicated for the implementation of public green open space and soft landscaping. This recommendation is envisaged in the adopted Wellbeing First Vision for 2050, and also in line with SPED provisions.
- v. The proposed revisions should also be sought as an opportunity to tie development consents with obligations related to the installation of extensive PV panels on the roofs of buildings. Cumulative roof space within such Industrial areas presents an opportunity for such installation with minimal adverse environmental impacts. Attention shall be given to avoid potential shading of such installation on lower buildings.
- vi. The updated Policy SMMR 01 still envisages the possibility for the PA to identify additional land for industrial use to make up for the areas proposed for exclusion. It is also noted that the SPED has in the meantime designated Areas of Containment as possible sites intended for industrial use. ERA therefore considers that any extension of land for industrial use shall only take place on land which is already committed for development with the development zone.
- vii. It is noted that the south-eastern agricultural site shown in policy map MR1 is part of a larger valley which is also proposed for scheduling as a Site of Scientific Importance (SSI) and an Area of Ecological Importance (AEI) as per policy map 3 of the SMLP. In this regard, it must be ensured that the valley and watercourse present at this site and its surrounding areas are protected from further development and spill-over effects from the Industrial Estate. Additional take-up or commitment of, or encroachment onto, this part of the site should be avoided. The revised Local Plan policy should specifically include a principle regarding the conservation of these important features, which should be considered as a form of compensation for the proposed higher development density and building heights as a result of this Local Plan revision.
- viii. ERA reiterates the other environmental recommendations made during Phase 1.

3. Conclusion

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