

██████████
Planning Authority
St. Francis Ravelin
Floriana, FRN 1230

27th August 2021

Dear ██████████

**Partial Review of the Central Malta Local Plan (CMLP) Area of Containment (AoC) at Tal-Handaq North, Qormi (June 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 SEA screening for the Partial Review of the Central Malta Local Plan (CMLP), dated June 2021, which the Environment and Resources Authority (ERA) received by email on 27th July 2021.

I am enclosing ERA's comments on the proposed revisions to Policy CG05 as designated by the CMLP (2006), relating to an Area of Containment (AoC) (as per Map QOB3), with the intention of ensuring that implementation of this policy avoids major environmental impacts.

Yours sincerely,



Perit Michelle Piccinino
Chief Executive Officer
Environment and Resources Authority



ERA's comments on the Partial Review of the Central Malta Local Plan (CMLP) Area of Containment (AoC) at Tal-Handaq North, Qormi (June 2021): SEA Screening

27th August 2021

1. Introduction

- 1.1 ERA welcomes the opportunity to comment on the SEA screening for the Partial Review of the Central Malta Local Plan (CMLP) Area of Containment (AoC) at tal- Handaq North, Qormi, dated June 2021, in accordance with Regulation 4(6) of S.L. 549.61 (Strategic Environmental Assessment Regulations).
- 1.2 These comments are provided without prejudice to ERA's review and comments at project stage when more detailed environmental assessment and/or environmental permitting may be required. Depending on their nature, location and scale, proposed projects may also require different types of environmental assessments, including an Environmental Impact Assessment (EIA) screening procedure in terms of S.L. 549.46 (EIA Regulations) or other assessments, screenings or studies as may be relevant.

2. Background

- 2.1 The site consists of Tal-Handaq North Area of Containment (AoC), which is directly adjacent to, and north of, Tal-Handaq Enterprise Hub (Industrial Area). The AoC is divided into two zones: Zones A and B (as indicated in Map HA1). Most of Zone A is already developed while most of Zone B predominantly consists of agricultural fields (see Figure 1). There were no changes to the proposed footprint, land use and building heights within Zone A, from that presented at Phase 3. With respect to Zone B, the footprint of each building block has been amended resulting in a decrease in the total GDF of blocks B1 and B2 and an increase in the GDF of block B3. Building heights remained the same in blocks B2 and B3 but was revised for block B1: from 15.4m to 3.75 levels above ground for retail/offices and to 2.75 levels above ground for the remaining uses in block B1. The latest revisions designated the entire block B2 and part of block B1 for retail/offices uses only, which cover an area larger than that indicated at Phase 3.
- 2.2 The change in the unit of measurement for building heights, from metres to levels, may introduce ambiguity in terms of the maximum resulting building heights in this area. This issue needs to be clarified in the final policy to avoid any possible misinterpretations at implementation stage. It is recommended that the unit of measurement for building heights is always referred to in metres.



Figure 1: Aerial image of the Area of Containment at tal-Handaq North, Qormi
Source: Planning Authority, Geoserver

3. General comments

- 3.1 ERA has reviewed the information provided with this SEA screening consultation and would provide the following comments.
- 3.2 The schemed road proposed at the edge of block B2 (at Phase 3) overlooking the ODZ area between the AoC and the settlement of Qormi has been removed. The land previously proposed for such road is now being designated for additional retail/office use. The removal of such road would result in built development directly at the edge-of-scheme. The same issue applies to the northern section of the boundary of block B1. Therefore, it is important to ensure that development is effectively contained within the AOC, so that no urban sprawl takes place beyond the AOC boundary. This will also depend on the implementation of the required design parameters for building facades overlooking ODZ so as to clearly define the edge-of-scheme and avoid possible encroachment of development onto ODZ land. The same applies in case of re-development at the northern boundary of block A3. As highlighted in the revised policy, no form of access shall be allowed to such buildings/facades from land ODZ. It is recommended that these considerations should be clearly reflected in the final Tal-Handaq North Policy Map.
- 3.3 The remaining pocket of ODZ land between the AoC and the settlement of Qormi could be subject to additional pressures for urban sprawl and/or encroachment of development, with possible adverse impacts on such area including the valley (Wied it-

Tigieġ) that passes through this pocket of ODZ land. It is therefore important to ensure that all future development is contained within the existing boundary of the AoC, including the entire width and extent of roads, service roads, access, pavements, boundary walls, car parking area/spaces, etc.

- 3.4 The area designated for retail and office use in certain blocks has been increased from that presented in Phase 3 at the expense of other uses within an AoC (e.g. industry, warehousing, storage and distribution). This could result in the displacement of pressures for industrial development and other related land uses elsewhere, thereby potentially affecting other ODZ areas.
- 3.5 Moreover, the updated proposals (e.g. the increase in retail and office space) in this Local plan revision are likely to intensify vehicular traffic in the area, which in turn would require upgrading of roads and road junctions. It is important to ensure that such works are kept to the barest minimum to avoid adverse environmental impacts. The intensification of traffic in the area may also have an adverse impact on air quality, which would ideally be studied comprehensively at this point in time where any impacts could be addressed through suitable actions and mitigation measures. While such aspects may be studied at a later stage during the development permitting process, studies and design of mitigation measures at this stage may prove to be more effective.