



BirdLife Malta Feedback on the Partial Review of the 2006 North Harbours Local Plan for Paceville (Villa Rosa Site)

26th November 2024

In view of the public consultation process for the published Partial Review of the 2006 North Harbours Local Plan for Paceville (Villa Rosa Site), BirdLife Malta would like to provide the below feedback:

Lack of transparency on the justification for this Local Plan Review

Although the Planning Authority (PA) outlines objectives for this Local Plan Review, it does not clearly explain the reasons behind it or why the existing 2006 Local Plans are no longer adequate. A review should ideally address specific gaps or meet particular needs, but in this case, it remains unclear what gaps or needs are being targeted. This makes it difficult to understand the rationale for the Planning Authority's decision to proceed with this Local Plan Review.

The usual justification of this by the Planning Authority is that there will be infrastructural improvements which will mitigate the impacts of intensification of development, but as experience has shown us, infrastructural changes have not solved problems arising from over-capacity. Moreover, increased infrastructure brings about its own environmental problems. As is evident from this proposed Local Plan Review there is no will to slow down this mad rush to further environmental chaos.

Lack of transparency on the request for this Local Plan Review

The Prime Minister has stated that a request was made – however who requested it and why, remains unclear. This request should be published, and the full extent of the request should be made clear to the public.

This would also indicate why this exercise (if requested by an individual) was undertaken by the government/PA when the individual requesting the modification of the Local Plan could have followed the Planning Control application procedure of Article 54 of Chapter of the Laws of Malta with the payment of the relative fees.

Lack of information on the re-configuration

A specific policy for the Villa Rosa area already exists within the current Local Plan. The proposed review states that the sub-zones designated in the original 2006 Local Plan area will be reconfigured. However, the map provided only outlines the boundary of the Villa



Rosa area without detailing the proposed reconfiguration. Without seeing the actual changes, the public cannot accurately assess how this reconfiguration might impact surrounding areas and quality of life, rendering this public consultation largely ineffective from the community's perspective. Meaningful public input can only occur once further clarifications and detailed plans are made available.

A specific policy for the Villa Rosa already exists and is incorporated in the present Local Plan. The proposed review states that the sub-zones identified within the original Local Plan area of 2006 will be re-configured. Nonetheless, the map presented only delineates the boundary of the Villa Rosa area without specifying the proposed re-configuration. Without presenting the actual reconfiguration, the public cannot form an accurate judgment of how the proposed reconfiguration will impact the surrounding areas and their livelihood. Therefore, this public consultation is ultimately a futile exercise from the public's standpoint. Meaningful representations from the public may only be made when further clarifications and detailed plans are published.

The current Local Plans for Villa Rosa already makes provision for the different areas within the site and their respective planning designation and density. The safeguarding of scheduled sites and areas of ecological value is also already provided for. In view of this it cannot be understood which parameters, the Planning Authority intends to change and to what end. It is quite clear, that this Local Plan Review is intended to accommodate and ensure the approval of the development planning application which has already been filed – enabling height increases which will overshadow the beach or other areas and introducing a greater number of hotel beds at a time when the country is already suffering the repercussions of over-tourism.

Increase in the site area to be regulated by this Local Plan Review

In the background to this Partial Review of the 2006 North Harbours Local Plan for Paceville (Villa Rosa Site), it is stated that, “*The Planning Authority has commenced a partial review of the 2006 North Harbours Local Plan for the Paceville area, **limited specifically to the Villa Rosa site as delineated by the 2006 local plan.***” However, there is a difference between the Villa Rosa site as delineated by the 2006 local plan and the Villa Rosa Boundary Map accompanying this Local Plan Review. The latter is larger than the Villa Rosa site as delineated by the 2006 North Harbours Local Plan as it extends to Moynihan House across the road from the City Centre site. Consequently, the statement issued by the Planning Authority that this partial review is “***limited specifically to the Villa Rosa site as delineated by the 2006 local plan***” is wrong and misleading.



Lack of definition of “higher quality hotels”

The Review document states that one of its objectives is to determine “c. *zones where higher quality hotels shall be allowed*”. This seems to be implying that “higher quality hotels” (as opposed to the other lower quality ones?) will be allowed to be sited in prime spots, possibly obstructing views of Villa Rosa, and/or shadowing the valley and/or the beach. There should be no preferential treatment for hotels if their siting impinges upon residential amenity or scenic or environmentally-sensitive sites.

Concluding remark

In light of the lack of clarity in the submissions made to date, we object to the proposed amendments to local plans to accommodate the developers of the Villa Rosa area and insist that these issues be addressed comprehensively before any further progress is made.