

This is a formal objection and should be posted or delivered to MEPA by Sunday 8th November latest.

If preferred, the points below can also be submitted online via [www.mepa.org.mt](http://www.mepa.org.mt) using the PA number to locate the case and then the "Submit representation" tab to open an online form.

Postal address is PO Box 200, Marsa MRS1000, Malta

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### OBJECTION TO PA/04211/09

Dear MEPA representative,

I would like to draw to your attention PA/04211/09 which is an application for an outline development permission at Forestals, Triq ix-Xatt and Triq Il-Kurunell Savona, Sliema for the demolition of the existing commercial premises and substitution with commercial, residential and garages.

This site is the last remaining area with access to the sea front which has not risen to 8 floors like the rest of the coastal area from Gzira, all the way around the whole of Sliema up to St Julians. This gap in this high rise cordon gives some breathing space to the residents living within this barrier, allowing fresh seaward wind to clear the inner town areas from the stifling summer heat and in turn lowering the day and night time temperatures. Apart from this, raising this last part of low rise buildings will choke the Villa Bonici area which, if preserved, can serve as the last open space within Sliema to serve residents for recreational purposes. This open space also provides vistas for the people living in the Savoy area.

Quoting from the North Harbours Local Plan of July 2006 there are various instances where Sliema is mentioned as an over-populated region :

Sec. 2.2.3: *'suffering from a lack of recreational space, infiltration of traffic, noise and other effects resulting from tourism development, commercial intensification and high housing densities'*  
and as an area which (sec. 2.2.3) *'cannot comfortably accommodate further development'*.

Sliema also has one of the highest dwelling density with (sec. 2.2.8) *'as much as 234 dwellings per hectare along the coastal belt'* and the area with most vacant property whereby (sec. 4.2.4) *'25% of all dwellings ... are completely vacant and this rises to ... 29% ... when partly vacant properties are included.'*

On the other hand sec. 1.4.1 of the Local Plan states that development congestion should be reduced *'by directing new development towards locations that are well served by public transport/the arterial road network'* and also *'promote environmental improvements in urban areas'*.

While the Local Plan policies aim at improving localities, MEPA's recent approval of more mega-projects has done just the opposite. Furthermore, sec. 4.3.4 states that *'in the congested areas of .... Sliema ... the emphasis will be on new housing through rehabilitation and selective redevelopment rather than through extensive building, height relaxation or redesignation of open space'*.

Also, Section 2.2, Issues ix; *In localities such as Sliema and St Julians further development would increase further noise, traffic, overshadowing, sense of enclosure and degradation of the public realm'*

Sec 4.2.13 Threats to Residential Amenity: 'Other threats to amenity include excessive height relaxation, narrow streets, loss of daylight and sense of enclosure.'

Furthermore this development violates the following MEPA regulation:

**POLICY UCO 10: Developments will not be permitted which adversely affect views of or from Urban Conservation Areas, or which detract from the traditional urban skyline. Particularly important views will be identified in detail in Local Plans.**

An inclusive Environmental Impact Assessment should be carried out for such a development in an already congested area, taking into account the new housing units that have been built in all of Sliema and Gzira, together with the other mega projects, namely Tigne Point, Fort Cambridge, Town Square, Piazzetta, Manoel Island, Galaxy Complex, Savoy Gardens and the Metropolis complex, that are either built or in the planning stage. A Social Impact Assessment based on comprehensive surveys and sociological analysis through proper public consultation is an essential part of this EIA.

As regards air pollution, Sliema has already surpassed the EU threshold for NO<sub>2</sub> and Benzene on several occasions but regrettably there is no data regarding other pollutants such as particulate matter since this is not monitored in Sliema. Keeping in mind that more than 25% of Sliema property is vacant and that Sliema has reached saturation point, and that thousands of permits for new housing units and commercial premises have been granted since the last Local Plan was drawn up, cars will definitely increase and so, pollution levels can only get worse.

Also, in view of a high potential increase in traffic due to the above mentioned reasons, the road network cannot take on more vehicles. Funds have already been allocated for this purpose but to date no major traffic alleviation projects have been carried out.

Apart from the road network, the other services namely water and electricity supply and sewers are already beyond their capability of supplying satisfactorily. Any more building will again make matters worse.

Sliema, as also referred to repeatedly in the North Harbours Local plan, has a serious lack of public open spaces and also a lack of privacy and breathing space within the several existing building blocks. Building more to what already exists will violate the provisions of the Local Plan.