

## Urban planning at its very worst - John Ebejer

The Planning Authority is to decide on the proposed City Centre multi-use development at the former ITS site at St George's Bay. The proposed development has been criticised for many reasons, one of them being that it is not compliant with the Floor Area Ratio (FAR) policy. The concept of FAR is to create spaces for pedestrians. This is achieved by allowing higher development over part of the site, while retaining other parts as public open space.

To rebut this criticism, the project architects drew up a document, dated June 11, 2018, giving computations that supposedly show the proposed development to be in line with the FAR policy. In planning terms, however, the document is irrational and complete nonsense, and I will explain why.

One of the requirements of the FAR is that 50 per cent of the site has to remain 'public open space'.

To bypass this requirement, the document subdivides the site into four and applies the FAR policy open space requirement to just one part of it. Such a subdivision cannot be accepted not least because the FAR policy can only be applied to sites that are bounded by roads on all sides.

To make matters worse, the document does not keep the computations for the four parts separate, but shifts around space and volume quantities from one part of the site to the other. These shifts are inexplicable other than to justify the unjustifiable.

Worse of all, a significant part of what the report considers to be open space is in fact roofed over. Even if publicly accessible, roofed-over space cannot be considered as public open space for the purpose of FAR computations.

The Planning Authority cannot possibly accept this kind of planning gymnastics because it makes a mockery of the planning system. It is also a dangerous precedent. If the PA accepts this, it will have to accept similar convoluted planning logic to justify any kind of development, anywhere.

The proposed development falls foul with the FAR policy in other areas as well. The FAR policy requires the developers to make the case for a tall building in the context of an urban design study. This will involve the evaluation of the relationship to the context, including among others topography, effect on the skyline and the contribution to the public realm.

One does not need to be an architect or a planning expert to realise that the proposed development is totally out of scale with its context and is an excessive visual imposition on the landscape and skyline. On scale, the development also goes directly against Local Plan policy NHPV04(iii).

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For Paceville, the policy specifies that the scale of new hotel development should be "consistent with the building height limitation and the character of the area".

Another planning document that has been severely abused in its interpretation is the hotel height limitation adjustment policy. This allows for additional floors to hotels to enable them to improve their facilities and offer a better product.

The hotel height policy is clear – it is to be applied only for hotels to provide for additional floors only for hotel rooms. The developer's intended 438-room hotel can be very easily fitted into the site, without having to increase its size or add additional floors. Therefore the hotel height policy is not applicable because there is no need for it. In a piece of twisted logic, the developer uses the hotel height policy to pack in more luxury apartments.

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The traffic situation for Pembroke residents is already a difficult one. In the morning, it takes 15 to 25 minutes just to get onto the main arterial road (St Andrews Road). The time lost and the stress caused to drivers are substantial.

It is no surprise therefore that Pembroke residents are very worried about the significant increases in traffic congestion that the ITS site development will bring. Vague promises of new road tunnels are useless. Road tunnels are expensive to build and it is unlikely that any government, now or in the future, would allocate funds to it.

In any case, the increase in traffic congestion will happen immediately the first construction vehicles move into the site. Promises of future road investment are very little comfort to those who have to deal with the traffic congestion on a daily basis.

Beyond the technicalities of planning policy documents, this is a development that will impinge negatively on people's lives, especially those living in the vicinity. People are genuinely distressed. The quality of their lives will be degraded because of increased traffic delays, construction traffic, pollution, shadowing, loss of amenity for pedestrians and significant visual impact.

They are also worried about the loss in value of their life savings, invested in their homes. For all these reasons, I urge the Planning Authority to refuse the application.

*John Ebejer is an urban planner.*