

23<sup>rd</sup> December 2020

Environment and Planning Review Tribunal  
Block B, St. Francis Ditch  
Floriana

Dear Sir,

**RE: Appeal against Planning Gain imposed on  
PA/01664/19 Proposed replacement of 2 existing quay cranes with 2 new ones**

This appeal should be reviewed side-by-side with the presently ongoing appeal against the planning gain of Euro 955,000 which was imposed on PA 3859/14.

Environmental Impact

The purpose of Planning Gain is to neutralize the Environmental Impact of the Freeport over the years since its inception.

The case officer's report clearly demonstrates that the proposed new cranes are quieter and more environmentally friendly than the ones they are replacing.

Thus it is not understood why the Planning Gain is being imposed in the first place.

Mitigation of Environmental Impact

A process of designs and PA applications have been taking place at the interface between the Freeport and Birzebbuga. This has been a collaboration between MFT, the Ministry for Tourism and Projects Malta. The projects are on Freeport land as well as on adjacent open public land contiguous with Freeport.

The three major projects are the following:

- 1. Public multi-storey car park project on the existing MFT car park.**  
Malta Freeport Corporation shall develop the land in accordance with PA/5998/18. The development is spread over a footprint of 5,500 square meters and is set to create a total of 464 parking spaces on 3 levels, for use by the Birzebbuga Local Council. The current market value of the project is estimated to be circa €2.32 million.
- 2. A landscaping project on public land between the slipway contiguous to the Freeport and the Bocci Club along the public foreshore (circa 6K square meters); PA/10028/17 Renewal of PA7849/06 "Formation of parking area, paving and landscaping works etc."**

3. **The afforestation project** on land that MFT had a PA application for the development of a container storage facility.

The Planning Application PA/178/10 was spread over an area of circa 55,400 square meters. This application was withdrawn by MFT in order to enable the afforestation project.

The current market value of the land, to be used as a recreation area, is estimated to be circa €2.75 million.

The above projects are at various stages of implementation.

Simultaneously, MFT have introduced noise attenuation techniques and stacking configurations that have helped considerably to lower the nuisance. In addition, MFT have contributed to the introduction of double-glazing by the residents closer to the Freeport.

Any Planning Gain imposed by PA must take into account all the efforts made by MFT to mitigate any negative impacts of the Freeport on the neighbouring areas.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Perit Joseph Bugeja', written over a vertical line.

Perit Joseph Bugeja