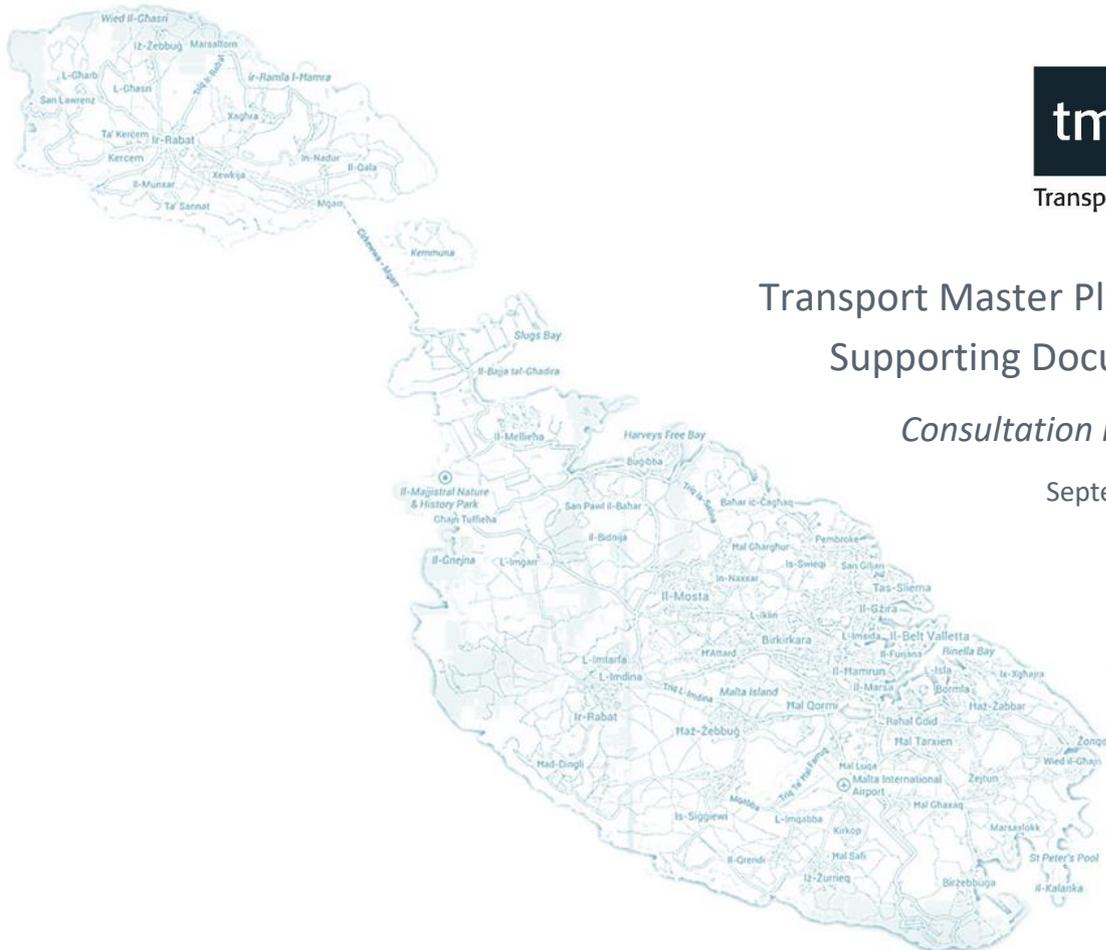


Development of a National Transport Model Supporting Strategy Development in Malta



Transport Master Plan 2025
 Supporting Document 2
Consultation Feedback
 September 2016



Operational Programme I – Cohesion Policy 2007-2013
Investing in Competitiveness for a Better Quality of Life
 Project part-financed by the European Union
 European Regional Development Fund (ERDF)
 Co-financing rate: 85% EU Funds; 15% National Funds





Transport Malta

Client: Transport Malta
Transport Planning Unit
Integrated Transport Strategy Directorate

Contact: Stephen Camilleri
Senior Manager (EU Affairs)
Transport Malta
Sa Maison Road
Floriana FRN 1612

Tel: +356 2560 8114

E-mail: stephen.j.camilleri@transport.gov.mt

Website: www.transport.gov.mt

Development of a National Transport Model Supporting Strategy Development in Malta:

Transport Master Plan – Supporting Document 2 – Consultation Feedback



Contractor: Ineco-Systematica Consortium

Contact: José María Llorente
Avda. Partenón 4-6
Madrid 28042
Spain

Tel: +34 91 452 12 00

E-mail: llorente@ineco.com

Website: www.ineco.com

Revision Details		
Version	Date	Remarks
0.9	28/09/2016	Draft Transport Master Plan – Supporting Document 2 – Consultation Feedback, for review
1.0	30/09/2016	Transport Master Plan – Supporting Document 2 – Consultation Feedback

Please cite this publication as:

Transport Malta (2016), *Transport Master Plan – Supporting Document 2 –Consultation Feedback*

Contents

1	FEEDBACK ON THE TRANSPORT MASTER PLAN	5
----------	--	----------

1 Feedback on the Transport Master Plan

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
1	General Comment	Department of Social Security, Ministry for the Family and Social Solidarity (MFSS)	19/07/2016	Given the due attention that is addressed to issues of accessibility and affordability in order to promote a more inclusive transportation system, the National Transport Strategy 2050 and the Transport Master Plan 2025 are indeed seen to converge with the strategic objectives of the National Strategic Policy for Poverty Reduction and for Social Inclusion 2014-202. A proposal is made to include reference to this National Policy in Section 1.3 of the Strategy.	Comment noted.
2	General Comment	Kamra Tal-Periti (Chamber of Architects & Civil Engineers) (Chamber of Architects & Civil Engineers)	22/07/2016	The two documents appear to be well researched and structured and suggest that a comprehensive review of the transport system has been undertaken with adequate recourse to the use of data, forecasting and expertise. This is very refreshing when compared to the Strategic Plan for the Environment and Development, which is severely lacking in this regard. The establishment of a long-term vision and an interim set of objectives for 2025 suggests an understanding of the need for long-term considerations and short and medium term action that spans beyond the term of electoral cycles.	Comment noted
3	General Comment	Kamra Tal-Periti (Chamber of Architects & Civil Engineers) (Chamber of	22/07/2016	Resource capacity remains a key concern. Without adequate resource deployment, there is a risk that this exercise will not “actually produce significant effects other than ensuring formal compliance in order to attract funds or meet regulatory requirements.”	A separate report on capacity to implement the Transport Master Plan is also being prepared in parallel.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		Architects & Civil Engineers)			
4	General Comment	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	Without a strategic prioritisation of key objectives, there are clear risks that certain measures will get prioritised at the cost of others that provide less obvious (but perhaps more significant long-term) economic benefit, are less marketable or less popular, are harder to implement and/or require more integrated policy deployment, or that prioritise certain user groups at the cost of other, usually weaker ones. Strategic planning needs to recognise that finite resources require a prioritisation of key interventions. In this light, it is noted that absolute priority needs to be given to those critical measures that will serve to ensure modal shift and the prioritisation of Public Transport, cycling and walking as key modes of travel.	Comment noted. Most measures concerning cycling and walking consider short term time lines. Measure 2.2.5.1 has been amended to be included in the short-term timeline, as well as new measures 2.2.5.3 and 2.2.5.4.
5	General Comment	Tonio Frendo	26/06/2016	Well done for what is an extremely extensive blueprint. I sincerely hope that this and future Governments implement the majority of the suggestions contained within this paper. Proposal to consider disruption to traffic brought about by pedestrian traffic lights. One solution could be to divert key pedestrian crossings underground (similar to the university roundabout) e.g. Birkirkara next to McDonald's or Triq Sant' Anna in Floriana or at the bottom of the hill in Marsa. Another interesting idea I recently saw in Switzerland was a button on pedestrian lights for the last person crossing to push and indicate that the lights can turn back to green immediately.	Comment noted. Grade-separated pedestrian facilities are normally provided on strategic, higher-speed roads where vehicle flow is prioritised. In the Maltese context, this relates to the TEN-T Road Network (Fig. 55). Grade-separated pedestrian facilities can be provided where there is sufficient space for pedestrian ramps on the footpaths. Within urban centres, surface-level pedestrian crossings which facilitate pedestrian movement are preferred. Transport Malta has been introducing pelican lights with pedestrian sensors which detect when a pedestrian has crossed the road to enable change of lights.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
6	General Comment	Daniel Cauchi	15/07/2016	It is unclear whether transport strategies and plans implemented by other countries or cities known to have a healthy transport mix (i.e. with a high proportion of trips carried out by bicycle or through walking, such as the Netherlands; Germany or London, UK) were consulted during the drafting of this document. However, it seems that several key features of these strategies which have demonstrated effectiveness have not been included in the Malta Transport Plan (MTP). I of course appreciate that each country, each location, is unique and requires unique targeted measures to be successfully implemented. However, since this is a critical document which will guide the development of local infrastructure and transport over the next decade and beyond, I believe that the apparent lack of linkages or references to successful interventions elsewhere is regrettable	Transport Plans and Strategies developed in other EU countries have been scrutinised during the compilation of the Malta NTS and TMP. In addition, expert input has been given from JASPERS and external transport consultants who have extensive experience in the drafting of transport plans and policies in other European cities countries.
7	General Comment	George Debono	18/07/2016	This report is excellent; it is comprehensive and has at last realistically broadened the context to include alternative mobility as walking, cycling and Public Transport.	Comment noted.
8	General Comment	Motor Insurance Association (MIA)	22/07/2016	The MIA fully supports a holistic approach to tackle the current and future challenges of transportation on land. Motor Insurance represents 46% of the non-life insurance business written in Malta, Motor insurers in 2015 paid over €46.5m in claims relating to motor insurance and at the end of the year held another €55m in reserves relating to outstanding claims. Motor insurers in Malta therefore are hugely interested in any developments and plans that may contribute to making roads safer and thus minimise the incidence of traffic accidents and the consequent costs. The cost of motor claims directly impacts the premiums charged to policyholders, who ultimately carry the financial burden.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
9	Chapter 1 Section 1.1	George Debono	18/07/2016	Weaknesses: Suggestions: “Hot summers, hilly terrain which may discourage active mobility as walking or bicycle and, possibly, Public Transport” “Existing road network is designed for vehicular traffic it will be difficult to retro-fit or adapt these to other mobility options”	Comment noted, included in revised draft.
10	Chapter 1 Section 1.1	George Debono	18/07/2016	There is just one point where I particularly disagree – “..... <i>Maltese roads have performed well in terms of road safety and, in recent years, Malta has retained one of the lowest per capita fatality rates in the EU</i> ” (p 21 Master Plan 2050). This statistic is based on <i>per capita</i> accidents/fatalities. Given our short trip distances, lower speeds and absence of (high speed) motorways, this statement is unrealistic. This statistic would show a different picture if it was based on distance travelled. The statement is liable to perpetuate complacency about our high accident rate. Maybe we should emulate Sweden’s “Vision Zero” and set ourselves a target.	Comment noted. The ‘vision zero’ target for road fatalities has in fact been taken into account in the National Transport Strategy, 2050.
11	Chapter 1 Section 1.1	George Debono	18/07/2016	There is a general shortage of qualified and experienced Transport Planners, Road Engineers and professionals specialising in Traffic Management’ Agree. Comment: This applies particularly to encouragement of bicycle commuting.	Comment noted.
12	Chapter 1 Section 1.1	Therese Bajada	07/07/2016	There is the need for a comprehensive parking strategy that includes private and public parking. Where necessary, policies that are nonexistent regarding temporary, improvised private parking should be implemented.	Noted. Will be considered under the development of Measure 2.2.3.1
13	Chapter 1 Section 1.1	Therese Bajada	07/07/2016	Data collection on mobility should involve the mobility of Maltese citizens, but should also include tourists and immigrants. These population segments form a significant portion of transport users, and exert pressures on the Maltese infrastructure and transport system.	Noted. This has been addressed in new Measure 2.2.1.9.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
14	Chapter 1 Section 1.1	George Debono	18/07/2016	Strengths : Suggestion: Addition of “Short trip distances which favour active mobility (walking, bicycle, Public Transport)”	Noted. Included in SWOT Summary for 1.1.1. Road Sector.
15	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	‘The road network lacks dedicated infrastructure for Public Transport services and cycle network provision is largely fragmented and does not effectively penetrate the main urban areas (weakness). In the future, this will require a more integrated approach by urban planners and transport planners.’ (TMMP, 2016: 19) BAG would tend to support this position taken by the master plan.	Comment noted.
16	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	‘One important characteristic of Maltese mobility is journey length, which on average is 5.5km.’ (TMMP, 2016: 21) BAG would tend to support this position taken by the master plan.	Comment noted.
17	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	<p><i>‘Despite increased spatial separation and decentralisation of homes and work places, the private car is nowadays more commonly used for very short distance trips where, in the past, walking or cycling would have been the preferred mode. With an average travel time of around 19 minutes for the private car during the morning peak and unrestricted, free parking available in many localities, car travel has become the preferred modal choice for many travellers at national and inter-regional levels.’</i> (TMMP, 2016: 21)</p> <p>Bicycle trip times of just under 11 minutes for faster Hare (32KPH) commuters with and slightly greater than 18 minutes for slower Tortoise (18KPH) commuters which compares very favourably with car trip times. Average bus trip times increase to 45 minutes with a ride time of 22 minutes at 15KPH (Ibid: 32). BAG would tend to support this position taken by the master plan.</p>	Comment noted. These local statistics will be included in this measure with reference to BAG.
18	Chapter 1 Section 1.1	Bicycle Advocacy	22/07/2016	‘One of the fundamental strengths of Malta geographically is the short distances between villages and towns, which lends itself to cycling,	Noted. Appropriate brackets for cycling speeds in urban areas and corresponding

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		Group (BAG)		possibly more so than walking.’ (TMMP, 2016: 16) A typical 5.5km trip by car is possible in a time slightly greater than 18 minutes at slow commuter (Tortoise – 18KPH), just over 13 minutes at the mean (also Pedelec - 25KPH) and just 11 minutes for faster (Hare - 32KPH) commuting speeds. Existing competitive and pastime riders tend to fall into the Hare 25-32KPH category. Catering for only what is effectively sub-Tortoise riders (below 18KPH) might be unproductive, create conflict and fail to tap into a ready-made rider base with traffic and riding skills. BAG strongly suggests setting an ideal criteria for infrastructure catering for cyclists between 18-32KPH.	infrastructure needs, will be developed as part of Measure 2.2.2.4.
19	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	<p><i>‘In today’s time-conscious society, the time taken travelling by bus is much slower than travelling by car for the equivalent journey. The time taken by car drivers cruising in search of an available parking space is highly unpredictable and seldom influences modal choice decisions.’</i> (TMMP, 2016:21)</p> <p>However cycling has a much greater and well proven trip reliability than any other form of urban transport. BAG would tend to support this position taken by the master plan.</p>	Comment noted.
20	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	BAG can confirm that sales and utilization of pedelecs has indeed fallen following the introduction of such strict regulatory frameworks. Utilization of motorized bicycles/pedelecs fell by 85% between 2012 and 2014 and continued to fall by 15%, whereas normal bicycle utilization rose by an average 20%. Pedelec sales across Europe continue to rise, even Italy a poor pedelecs performer managed a 3% growth in 2014 and local industry sources noted a drop in sales between Q1:2015 and Q1:2016 of 75%, while normal pedal cycle sales have remained healthy. The policy on pedelecs needs to be drastically changed, starting from scratch. Malta is the only state to register 250w pedelecs, yet does not monitor this at ports of entry, has failed to move the technical section from Hornsditch to the A3 Towers, forces pedelecs	Noted and is reflected in Measures 2.2.2.4 and 2.2.10.3 and their development. In addition Measure 2.2.2.2. has been amended to include alternative modes.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				riders to wear helmets where there is no scientific basis to require them to do so, any more than normal bicycle riders do, has failed to answer questions on how many unregistered or over-the-limit motorised bicycles (or other electric two wheelers/scooters)1 have been removed from our roads or carried out a CBA to determine the balance of cost of lives lost due to head injury versus lives saved through greater physical activity as seen in other EU states. See 2.2.2.4 re NCS	
21	Chapter 1 Section 1.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	The constraints on increasing road supply must be recognized as an opportunity to change our transport policy paradigm from a “predict-and-provide” to a “management” one. It is important to appreciate that no city has ever managed to build its way out of congestion. Duranton and Turner (2009) have showed very clearly that new roads create new drivers resulting in the intensity of traffic to remain the same. The concept is of induced demand where increasing the demand for something (like roads) makes people want that thing even more. <i>Duranton, G, Turner, M.A. (2009) The fundamental law of road congestion: evidence from US cities. National Bureau of Economic Research. Working Paper 15376. Available at http://www.nber.org/papers/w15376.pdf</i>	Comment noted.
22	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	Re. uptake of electric vehicles - While this is true of car based EV's the same level of investment and policies, that are negative in their effect, have hindered the uptake of pedelecs, with sales for first quarter of 2016 75% down on the same period in 2015, while utilization has been observed as falling 85% between 2012-2014 and a further 15% in 2015 in National Bike Counts. The TMMP and TMMS must formulate a policy change to reverse this and capitalize on the 28% of respondents who said that they probably would ride and electric bicycle in the MNEP. BAG would tend to support this position taken by the master plan and the notion that the current policy on pedelecs is not working. While it may be easier to remove the registration restrictions a sticking point tends to be around cycling helmets, thinking that these save	Noted and is reflected in Measures 2.2.2.4 and 2.2.10.3 and their development. In addition Measure 2.2.2.2. has been amended to include alternative modes.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>cyclists. While they save a very small percentage accident rates tend to rise because of a fall in the safety in numbers effect. This is why BAG recommends voluntary use but not mandatory use.</p> <p>A cycling helmet is not designed to be used in situations to protect riders against collisions with any other vehicle. Minors use them and riders in sports events but these situations are usually devoid of traffic. They are essentially a 'bump cap' from an OHS perspective and cannot be seen as effective in protecting the rider from the greatest threat – cars moving at velocities for which EC1078 helmets were not designed. If helmets are retained BAG would have to insist that fully segregated infrastructure be provided to provide an effective level of safety from cars for the whole cyclist not just his or her head. See also PBS.</p>	
23	Chapter 1 Section 1.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	<p>Caution must be exercised in the comparison of Malta to much larger member states or countries. Malta is a city-state comparable, also in density, to major cities. In its report commissioned by the European Commission Representation in Malta, the Institute was very cautious not to compare congestion levels and costs to other member states but focus on comparability with cities such as London and Brussels (Attard, Von Brockdorff and Bezzina, 2015, pg 41).</p> <p>See more at https://ec.europa.eu/malta/sites/malta/files/docs/body/study_on_traffic_online.pdf</p>	Comment noted. The Master Plan addresses this concept under measure 2.2.2.7 where Malta is compared in nature and size to that of a European city. Therefore it is advocated that SUMPs should be developed accordingly.
24	Chapter 1 Section 1.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	<p>A strong focus on the arterial roads is important and this topic is well covered by the Master Plan. However the transport infrastructure extends to local councils where access roads should be designed to promote accessibility and mobility and support quality of life. Measures should address the resources of Local Councils to plan, manage, re-design and maintain the local road network (in line with many other measures as mentioned later in the Master Plan itself). Our research (Attard, Miceli Farrugia and Borg Barthet, 2016) has identified significant resources issues at Local Council level which require urgent</p>	Comment noted. Measures under Objective 2.2.8, aim to improve the functionality of secondary connectivity and improving the quality of urban areas. In addition, the document has been revised to include two additional measures (2.2.5.4 and 2.2.5.5) specifically targeting local streets and local councils.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				attention.	
25	Chapter 1 Section 1.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The increase in car trips alongside the increase in bus trips (as claimed in the Strategy document – see comment there) is a sign of increased mobility. Hyper-mobility was a term coined by John Adams in the 90s referring to increased material well-being and increased travel. This was supported by increasing VKMs (car) and PKMs (Public Transport) in many European cities (source: Eurostat energy and transport statistics).	Comment Noted
26	Chapter 1 Section 1.1	OPM Energy and Projects - Water Services Corporation (WSC)	16/08/2016	<p><i>"Construction and reconstruction of road infrastructure requires significant coordination between Transport Malta, Local Councils and service utility entities for electricity, water, drainage and communications and agencies responsible for preservation of heritage. Delays to the implementation of projects have occurred as a result of certain service utilities not having a clear understanding of where their buried services lie. Delays to the implementation of projects can also commonly occur when historically significant artefacts, buildings or structures are found during road excavations. The establishment of a clear ten year plan for road infrastructure investment will facilitate better integration and improved cooperation between entities and stakeholders at the planning stage (opportunity)."</i></p> <p>Though not specifically directed to the above, this has in the recent past put a big onus of stress and financial negative impacts on the WSC (rural roads, EU funded projects, etc.) the fact that TM gives a short period to WSC to provide the necessary information on new infrastructure (especially sewer) and or replacement of old sewer network. This information includes amongst other things thorough land surveying and quantity surveying which involves days if not weeks. TM normally gives five days which includes weekends at times. A longer period needs to be</p>	Comment Noted. This has been addressed in Measure 2.2.1.7.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				considered for a more feasible and collaborative approach.	
27	Chapter 1 Section 1.1 (Threats)	Paul Debono	27/06/2016	One way streets were done to satisfy the need of constituents, to win votes in local council elections. Opening one way streets, will divert some traffic to secondary roads, relieving pressure on the main road arteries	Comment noted.
28	Chapter 1 Section 1.1 (Threats)	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	Ambient Air Quality and Noise levels are highly dependent on transport and this needs to be taken into account. Biodiversity is also at risk regarding the development of new roads.	Comment noted. The effects of transport on biodiversity and air quality have been added as 'threats' in the SWOT analysis.
29	Chapter 1 Section 1.1 (Threats)	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	Threats – Recent research at the Institute has shown that risks from climate change are not exclusive to the coastal areas but also in areas prone to flooding as the frequency of extreme weather events (e.g. flash flooding) is set to increase. Attard (2015) identified over 6% of the main arterial and distributor network affected by sea level increases following a 2m increase in sea level. Whilst 10% of arterial roads, 6% of distributor roads and 7% of rural roads would be prone to flooding during rain events. See more at: http://www.mcs.org.mt/mcs.org.mt/xjenza/216-xjenza-2015-2-7	Noted. Measure 2.8.2.2 addresses the need to consider the impact of climate change and sea level rise on transport infrastructure. The revised document has been amended to make reference to previous studies carried out by the University of Malta - Institute of Climate Change and Sustainable Development (ICCSA).
30	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	<i>'The continued increase in demand for on-street parking in residential areas often has a negative impact on traffic circulation through further narrowing of road carriageway and through the introduction of one-way systems which result in longer journeys.'</i> (TMMP, 2016: 23) This has also conspired to make many bicycle trips untenable, increasing trip	Comment Noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				distance, road risk and involving the climbing of unnecessary hills. Examples include the closure of the bicycle track at Marsascala and the introduction of the one way between Gudja and Kirkop, and Bisazza Street for example. Little consideration is given to how these increase rider risk and effort, and any new infrastructure or route changes should consider this. Especially as these are often introduced to facilitate car use at the cost of pedestrians and cyclists. BAG would tend to support this position taken by the master plan.	
31	Chapter 1 Section 1.1	Bicycle Advocacy Group (BAG)	22/07/2016	<i>'...transport policy and planning in Malta tend to be short-term in nature, with measures and projects primarily focussing on new road construction or increasing existing road capacity at problematic locations in isolation rather than considering the wider strategic policy context.'</i> (TMMP, 2016: 23) Very rarely are cyclists consulted, particularly in smaller interventions, often creating conflicting infra. Importantly the trip efficiency of cyclists and pedestrians should be valued the same way. An effort to road space equity should be adopted. BAG would tend to support this position taken by the master plan.	Comment Noted
32	Chapter 1 Section 1.1	Therese Bajada	07/07/2016	It is good to have a Masters Course in Transportation Engineering. However, there should also be a focus on maritime and aviation; land transport should not only be linked to road engineering. It is necessary, to establish connections with other faculties, institutes and departments. Transport (even as indicated in the Master Plan) is linked to several other disciplines. Hence, inter-disciplinarity should be encouraged. Ideally, there would be programmes that link research between the University (and other academic institutions) and TM, where TM benefits from the research work, and students and institutes, faculties and departments benefit from data and work experiences.	Comment Noted. Measure 2.8.3.1. has been expanded to widen the scope of transport research
33	Chapter 1 Section 1.2	University of Malta -	16/08/2016	Reference is made to the studies and projects undertaken by the University of Malta in the field of Demand Responsive Transport (DRT).	Noted. Reference has been made to the ongoing University study under Measure

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		Institute of Climate Change and Sustainable Development (ICCSA)		The University is currently testing a prototype for a Shared Demand Responsive Transport System for the Msida Campus, funded by Vodafone Malta Foundation.	2.3.8.2.
34	Chapter 1 Section 1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	With reference to the “lack of space allocated to the safe and efficient Public Transport”, a good number of examples abroad show how space is available if a strong policy decision is taken in favour of Public Transport over private cars. This is a similar approach taken in the study carried out in Lija where space was given back to pedestrians.	Noted. The Lija Case Study has been referenced under Measure 2.2.3.1
35	Chapter 1 Section 1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	Between 2011 and 2014 the Institute carried out studies on aspects of Public Transport operations. These studies should be used to support the claims made in this section. Some of the earlier studies have been published (Attard, 2013) and more recently analysis on elderly mobility could shed further light on the performance of Public Transport services.	Comment noted.
36	Chapter 1 Section 1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	So far there is little evidence to suggest that land use development will be planned and transport given due consideration in the planning process. This is a very urgent matter which has and will continue to increase the problems of travel and transport.	Noted. This comment will be referred to the relevant competent authority – Planning Authority (PA)

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
37	Chapter 1 Section 1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The issues raised about housing and activity densities are correct. However questions regarding (i) correct and updated density information; (ii) carrying capacity; and (iii) thresholds that guide the provision of private versus Public Transport.	Data used was based on NSO Census 2011, extrapolated to 2014 - the latest official data available at the time (Base year 2014). Comment is noted, and will also be referred to the relevant competent authority Planning Authority (PA).
38	Chapter 1 Section 1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The concerns over Comino should be integrated with the Management Plan currently under development at the Environment and Resources Authority	Noted. It will be referred to the relevant authority - Environment and Resources Authority (ERA).
39	Chapter 1 Section 1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The Existing Conditions and Data Diagnostic Report which is referred to in the Master Plan is not available.	Noted. This supporting document will be published in due course.
40	Chapter 1 Section 1.2	OPM (Energy and Projects) - Sustainable Energy and Water Conservation	16/08/2016	<i>"the demand for travel by bus is currently being provided through a fleet of 374 modern, lower floor, low emission (euro 6 engine) and fully accessible buses"</i> Was the energy savings from this measure calculated? If not, could TM, or the authors to the Plan provide raw data so that SEWCU can determine the related energy savings?	Fuel utilisation is assessed routinely by the relevant competent authority – Malta Resources Authority (MRA).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		Unit (SEWCU)			
41	Chapter 1 Section 1.2	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	16/08/2016	<i>"The overall Public Transport modal share was in the region of 16% of 2010 and, due to the constant increase of patronage recorded during the period 2011 – 2015, modal share today is more likely to be greater"</i> Was the energy savings from the increase of patronage calculated? If not, could TM, or the authors to the Plan provide raw data so that SEWCU can determine the related energy savings?	Fuel utilisation is assessed routinely by the relevant competent authority - Malta Resources Authority (MRA).
42	Chapter 1 Section 1.2	Therese Bajada	07/07/2016	These marginalised communities would probably rely heavily on personal modes of transport. In these cases, smart choices should be introduced by introducing, for instance, mobile kiosk services (e.g. mobile library) to these communities.	Comment Noted.
43	Chapter 1 Section 1.2	George Debono	18/07/2016	Threats. Suggestion: add: "Opposition to bus lanes by strong car lobby"	Comment noted, and included in revised draft.
44	Chapter 1 Section 1.2	Bicycle Advocacy Group (BAG)	22/07/2016	'Footpaths which provide pedestrian access to bus stops are often discontinuous and unsafe; this has a direct impact on usage of Public Transport.' (TMMP, 2016: 31) BAG would tend to support this position taken by the master plan.	Comment noted
45	Chapter 1 Section 1.2	Bicycle Advocacy Group (BAG)	22/07/2016	'The average ride time for bus users during the peak hours is around 22 minutes and, at an average speed of 15km/h during peak hours, bus services travel at approximately 33% slower than private cars.... (However)average journey times increase to over 45 minutes. (TMMP, 2016: 32) BAG would tend to support this position taken by the master plan.	Comment noted
46	Chapter 1 Section 1.2	Justin Zarb	22/07/2016	"modal share today is most likely to be greater." This data should be available from the 2014 survey. Could it also be published please? This is an important figure.	2014 data emerging from the transport model analysis has been extrapolated from the census 2011 and NHTS data. This

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
					information will be made available at a traffic zone-level.
47	Chapter 1 Section 1.2	Justin Zarb	22/07/2016	Paragraph titled "Fares charged in unscheduled transport". This offers an opportunity to mitigate congestion using a policy intervention. What impact would a price cap on unscheduled transport have on congestion? Perhaps TM could work with University of Malta to provide recommendations to the ministry of Public Transport.	Comment noted.
48	Chapter 1 Section 1.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Clearly acknowledges the imminent need to incentivise and take measures to include private collective transport within the framework of our national transport eco-system.	Comment noted.
49	Chapter 1 Section 1.2	Justin Zarb	22/07/2016	"This pre-paid ticketing system has reduced cash handling on board the buses, has speeded (sic.) up boarding times (and therefore journey times)" are there any figures that back up this claim?	This statement is based on the feedback from the bus operator, following the introduction of the prepaid Tallinja card system.
50	Chapter 1 Section 1.2	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	The reference (p.31 of the 2025 Master plan) to a possible modal shift towards Public Transport in the period 2011 to 2015 is questionable. An increase in the use of Public Transport may represent greater overall travel (but unchanged modal split), increase in tourism figures (and hence a likely increase in Public Transport use), or changes in the manner of data collation. While an increase in the modal share of Public Transport would be welcomed, reference to data that gives no clearer understanding of the actual situation does not favour long-term progress.	Comment noted. Modal shift can only be accurately quantified with a significant survey sample by carrying out a nationwide travel survey such as the NHTS. This is addressed in Measure 2.2.1.8.
51	Chapter 1 Section 1.2	Ministry for Sustainable Development,	17/08/2016	There is nothing mentioned regarding air and noise pollution	The threat of air and noise pollution is raised in Section 1.1. on Road Transport. In addition, Objective 2.2.4 and Objective

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	(Threats)	the Environment and Climate change (MSDEC)			2.6.7 address this.
52	Chapter 1 Section 1.2 (Opportunities)	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	<p>Park and Ride (P&R) are seen as opportunities in the Master Plan. There is no usage data to support such claims. And there have been no studies on the operational failures of Pembroke and potentially Marsa (based on reports on newspapers and site observations). On another note, research that the institute published in 2011 showed that P&R (in Floriana) attracted bus users rather than car users (Attard, 2011). This goes against the principle aim of developing P&R. This is something which requires further investigation to ascertain the future potential of P&R in Malta.</p> <p><i>Attard, M. (2011) A preliminary assessment of the Park and Ride Scheme in Floriana, Malta. Paper presented at the International Conference on Sustainable Development organised by Kamra Tal-Periti (Chamber of Architects & Civil Engineers) (Chamber of Architects & Civil Engineers) and the European Council of Civil Engineers, Malta.</i></p>	Comment Noted. This will be considered in the development of Measure 2.3.2.1 which has also been amended to reflect this.
53	Chapter 1 Section 1.2	Therese Bajada	07/07/2016	It is also important to understand the issues that bus drivers face. Their well-being is essential, especially if the target is to minimise the turnover of the drivers, and invest more in training and retaining the same drivers. If the bus drivers are motivated and committed to their job, there is a higher probability that they get more used to the routes and provide a better service.	Driver training and aspects of driver well-being are mandatory requirements in the concession contract between Government and Malta Public Transport.
54	Chapter 1 Section 1.3	University of Malta - Institute of Climate Change and	16/08/2016	[Data on the operation of water taxis] for landing sites for water taxi services operating between coastal towns at intermodal hubs.	The opening of the water taxi market in 2010 had resulted in the licensing of four private sector water taxi operators. However, there are currently no water taxi services in operation due to

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		Sustainable Development (ICCSA)			fluctuations in demand. It is important to study the nature of and potential for the demand for this type of inter-modal transport.
55	Chapter 1 Section 1.3	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The freight transport link between Sa Maison and Gozo was very important as it shifted freight traffic from road to sea. Data on the number of HGVs using the service would quantify the impact of removing such a service.	Comment Noted. Measure 2.5.4.4. relates to the reintroduction of the freight ferry link
56	Chapter 1 Section 1.3	Ministry for Gozo	22/07/2016	Intermodal transport for freight had been provided between the port of Mgarr (not Cirkewwa) and Sa Maison quay until 2015	Noted. Amended in revised draft.
57	Chapter 1 Section 1.3	George Debono	18/07/2016	Strengths: Possibly add: 'Availability of a large expanse of Harbour surrounding a densely populated area offers an opportunity for alternative (ferry) transport option.'	Noted. Included in revised draft.
58	Chapter 1 Section 1.3	Bicycle Advocacy Group (BAG)	22/07/2016	The TMMP fails to mention the potential of cycling as an intermodal last mile lynch pin in the provision of passenger transport services either from a public bike share perspective or private owners. Apart from folding bicycles neither does the public bus operator accept bicycles on the service. Neither does it include the Barrakka lift which is a significant boon to cyclists, which could be copied elsewhere.	Noted. Measure 2.4.2.5 to include reference to this.
59	Chapter 1 Section 1.4.1	George Debono	18/07/2016	"with such strong growth, the ferry service to Valletta remains underutilised by commuters " Repeat: A deterrent may be the long uphill climb on the Marsamxetto side where no lift is available. With a trans-Isthmus connection the Barrakka lift could be used.	Noted this is reflected in Measure 2.4.2.4

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
60	Chapter 1 Section 1.4.1	George Debono	18/07/2016	<p>Weaknesses: "The inner harbour ferry services (especially between Valletta and the Three Cities) are mainly used by tourists, while local commuters make limited use of it during peak hours."</p> <p>This may not necessarily apply if the harbour ferry were to be extended to the whole of the harbour area. A deterrent may be the long uphill climb on the Marsamxetto side where no lift is available. With a trans-Isthmus connection the Barrakka lift could be used.</p>	Noted. This has been addressed in Measure 2.4.2.3. and Measure 2.4.2.4
61	Chapter 1 Section 1.4.2 (Threats)	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	16/08/2016	<p>One of threats in page 44 identified in the SWOT analysis for external maritime transport has been stated as: <i>"No studies on the need for alternative fuel supplies (such as LNG)"</i></p> <p>In page 47 the same issue was comment in further detail: <i>"Limited studies on the provision of alternative fuels for shipping have been carried out (only a shore-supply study in 2015) and no analysis of the needs of fuels such as LNG has yet been carried out"</i></p> <p>These two statements are not correct. TM had been informed about the LNG bunkering study being conducted by SGS consultants. In fact the ToRs of the SGS study were discussed during the Technical Working Group meeting of the 9th October with a copy of the ToRs forwarded to TM.</p> <p>SEWCU has assumed responsibility for the LNG studies for bunkering purposes (only) in its effort to conduct all necessary studies and paperwork to bring to fruition the possibility for the construction of an Natural Gas pipeline between Sicily and Malta.</p> <p>The direction to facilitate LNG bunkering is clear.</p> <p>It is to be noted that Alternative Fuels Directive, 2014/94/EU , also considers other non-conventional or renewable sourced fuels and any</p>	Comments Noted. The LNG study referred to has not yet been concluded and the only report we are aware of relates to Transport Malta's publication within the Port PVEV project regarding shore supply.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				issues tied to these alternative fuels or non maritime bunker related.	
62	Chapter 1 Section 1.4.2 (Threats)	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	Transboundary pollution is also another type of pollution which needs to be taken into account in order to achieve the required environmental targets in line with EU and International obligations.	Comment noted.
63	Chapter 1 Section 1.5	Malta Air Traffic Services Ltd. (MATS)	11/08/2016	Malta Air Traffic Services Ltd. (MATS) also agrees with the last sentence to the last paragraph in page 52. This complex policy and responsibility framework has scope to be simplified.	Comment Noted. This is reflected in Section 1.5
64	Chapter 1 Section 1.5	Malta Air Traffic Services Ltd. (MATS)	11/08/2016	As an air navigation service provider, we support fully this measure. In the meantime, in our opinion the document is lacking to differentiate between MIA plc as the Airport managing Body and the Airport, as the aerodrome. We suggest that the above is changed to <i>“..., the lack of space within the airport boundaries is threatened by competing non-aeronautical business interests which impact airport operation, especially due to the existing physical constraints of the areas surrounding the airport including land transport (weakness).</i>	Comment noted. The suggestion has been amended in the revised document.
65	Chapter 2 Section 2.1.2	University of Malta - Institute of Climate Change and Sustainable Development	16/08/2016	The four stage model was developed in the US in the 50s and although still used in parts of the world it does not come without criticism. The model rigidity is probably its main weakness. As has been the fact that land use is considered exogenous to the process, rather than being integrated into the model. Land use and Transport Models were developed to offer an improvement over classic transport models, as do Activity-based models. Although there is still much research in the case	Comment Noted. However, the four stage model was deemed to be the most appropriate model for the development of the transport master plan and, in particular for the testing of future transport scenarios containing packages of different transport policies and

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		(ICCSA)		of activity-based models, land use and transport models have developed significantly and should be considered also for Malta, an ideal setting given the size and geography.	measures.
66	Chapter 2 Section 2.1.3	Justin Zarb	22/07/2016	Do predictions exist for the Public Transport situation in 2030, once the TEN-T network has been completed?	Forecasts for traffic flow, Public Transport patronage and traffic congestion have been carried out for the year 2025 in the AM and PM peak. Four different scenarios have been modelled for comparative purposes: Do Nothing, Do Minimum, Do Something 1 (moderate package of infrastructures and transport policy measures) and Do Something 2 (strong package of infrastructure and transport policy measures).
67	Chapter 2 Section 2.1.4	Bicycle Advocacy Group (BAG)	22/07/2016	It is not clear if cycling has been included as a possible option in the cost estimate model and particularly if the cost benefit of numbers greater than the 2% TM target for 2020 have been applied. In addition, it is not evident that the financial or socio-economic aspect that increased bicycle traffic brings to neighbourhoods, local business communities and property values as seen elsewhere. The master plan misses out on the potential socio-economic benefits that cycling can bring. This is a value added that can be used to sell cycling to politicians, business leaders and communities.	Comment noted. Transport Malta has been exploring the opportunity to use the WHO's HEAT Assessment Tool for both walking and cycling.
68	Chapter 2 Section 2.1.5	Environment and Resources Authority (ERA)	26/07/2016	Proposals for the expansion of the actual ports/harbours are of strategic environmental concern. The details of the options and alternatives that are being considered are still unclear. Noting the sensitivity of the surrounding environments of particular ports, e.g. Mgarr port itself, Environment and Resources Authority (ERA) will provide further comments once more detailed information is available at this stage i.e. before any policy-level commitments are made regarding their	Comment noted. The whole Master Plan process is subject to a Strategic Environmental Assessment and Appropriate Assessment at programme level. Individual projects will also be subject to Environmental Impact Assessment and Appropriate Assessment

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				expansion. Environment and Resources Authority (ERA) considers that such proposals, suitable alternatives and their environmental impacts need to be studied strategically, including cumulative, holistic and consequential impacts. In particular, it is important that strategic assessments take into account: (i) the allocation of uses of port space holistically; (ii) the environmental and physical capacity of ports to accommodate the planned expansion of facilities within the existing ports/harbours and uses without resulting in unacceptable environmental impacts; and (iii) the feasibility of successfully implementing plan-level proposals without resulting in other consequential and other site-specific development proposals which are not accounted for in strategic-level assessments.	at project level.
69	Chapter 2 Section 2.1.5	Environment and Resources Authority (ERA)	26/07/2016	Proposals for the provision or expansion of specific facilities within ports, including quays and pontoons, are also to be assessed once more details are available. These should be analysed holistically and cumulatively, also taking into consequential impacts, in view of their potential impacts on the affected coastal/marine environment, including hydromorphology and the species and habitats within such areas.	Comment noted. The whole Master Plan process is subject to a Strategic Environmental Assessment and Appropriate Assessment at programme level. Individual projects will also be subject to Environmental Impact Assessment and Appropriate Assessment at project level.
70	Chapter 2 Section 2.1.5	Environment and Resources Authority (ERA)	26/07/2016	Mgarr Harbour is located in a highly sensitive environment including its topography and the marine SAC of International Importance 'Zona fil-Bahar fil-Grigal ta' Malta'. Any upgrades or expansion of this port, as mentioned in the Master Plan, will require careful consideration of the marine environment (e.g. Posidonia oceanica meadows), the topography of the area and the overall natural state of the surroundings.	Comment noted. The whole Master Plan process is subject to a Strategic Environmental Assessment and Appropriate Assessment at programme level. Individual projects will also be subject to Environmental Impact Assessment and Appropriate Assessment at project level.
71	Chapter 2 Intro 2.2	George Debono	18/07/2016such as parking control to reduce or redistribute travel demand." Suggest addition of 'discourage': ".....such as parking control to	Comment Noted. Text has now been amended to reflect this proposed text

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				reduce, discourage or redistribute travel demand” (assuming that this refers to private car use !)	change.
72	Chapter 2 Road Transport Objective 2.2.1	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	The document makes repeated reference to the notion of car-culture. On the other hand statistical evidence of car ownership within the document itself clearly suggests that this is a recent phenomenon (occurring in the last 30 to 35 years) that has largely occurred as a result of poor governance decisions dealing with both issues of a spatial nature (e.g. housing and other land use deployment) and those of a regulatory nature (e.g. management of Public Transport pre-2011). The 2050 timeframe of the strategy is comparable to the timeframe in which the ‘car-culture’ has evolved and provides an excellent opportunity to gradually but radically alter that culture.	Comment noted.
73	Chapter 2 Road Transport Objective 2.2.1	George Debono	18/07/2016	Comment re: “Trend of increased spatial separation between homes, workplaces and places of education resulting in decentralisation.....” (to which one might add ‘entertainment’):	Comment Noted. This has been revised.
74	Chapter 2 Road Transport Objective 2.2.1.	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The Master Plan requires better governance for integrated land use and transport planning. Without this integration no transport policy or measure will be successful.	Comment noted. This has been referred to in Measure 2.2.1.2.
75	Chapter 2 Road Transport	Therese Bajada	07/07/2016	Monitoring should be one of the priorities, to ensure that the objectives and proposed measures are implemented. It is suggested that there is a set of guidelines that look into the monitoring aspect, and that are self-	Comment Noted. Measure 2.2.1.1.has been revised to reflect this.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.2.1.1			regulatory, or if necessary sub-contracted.	
76	Chapter 2 Road Transport Measure 2.2.1.1	The Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this stance. It does indeed make sense to have an overarching strategy which also includes periodic (10 year) action plans and actionable measures attached to them.	Comment noted.
77	Chapter 2 Road Transport Measure 2.2.1.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Positively acknowledges the need for a national transport strategy which looks at immediate short-term actions that should not wait for holistic overview, steered towards and paired with, actions directed at longer term goals. This has to however be timeframe-based, with clear timeline indications – the lack of which would lack possibility for accountability and ensuring that these are binding and concrete. This also echoes the need of political commitment and consensus across the board. This exercise cannot be futile but a committed and concerted effort which the country desperately needs.	Comment noted. The final Transport Master Plan will clearly identify timelines, costs and responsible bodies for the physical (infrastructure, IT, etc.) projects, studies and policy measures that will be implemented over its ten-year lifespan. Monitoring of the implementation of the measures will form an integral part of the TMP.
78	Chapter 2 Road Transport Measure 2.2.1.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Positively acknowledges needs to incentivize Private Collective Transport and encourage employers to invest in parking facilities and joint traffic solutions in addition to the need of effective transport planning. It is necessary however that extending the effectiveness of Public Transport system should be partnered with private collective transport rather than duplicating efforts when the private sector has the resources to support in such way as suggested. In terms of double-use of parking spaces, this a positive note since retail and employers need to have accessibility and this cannot be taken away for residential use which is often not as in demand during specific times of day. This would result in maximisation of use of the same parking space.	Comment noted. These have been addressed in Measure 2.2.2.2 and Measure 2.2.1.2.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
79	Chapter 2 Road Transport Measure 2.2.1.2	Bicycle Advocacy Group (BAG)	22/07/2016	<p><i>In developing spatial land use within a transit oriented framework which aims to 'set up continuous discussions with the spatial planning process to move towards centralization and accessibility of facilities and review transport and development planning policies in relation to a Principal Urban Area with a central hub' cycling remains both the best 'bang-for-buck' sustainable imprint for conducting commuters between nodes in such developments (TMMP, 2016: 66).</i></p> <p>However, while broad consultations have included cycling, key developments such as the Kappara roundabout stakeholder meetings have often excluded cyclists even though these meetings clearly affect traffic in a wide number of 'knock-on' communities. As a key modal shift leader cycling needs to be built in rather than built over or a bolt-on accessory or after thought. Key to this mind set, is designing transport within and too communities rather than engineering them for car use. - BAG would tend to support the position taken by the master plan but would suggest that this is simply tweaked to include cycling.</p>	Comment Noted. Measure 2.2.1.2 has been updated to include cycling and walking
80	Chapter 2 Road Transport Measure 2.2.1.2	The Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal.	Comment Noted.
81	Chapter 2 Road Transport Measure 2.2.1.2	Environment and Resources Authority (ERA)	26/07/2016	The draft Master Plan identifies priority actions for further investment and implementation of measures to improve Malta's transport system and service. Our main interest focuses on actions involving infrastructural projects and site engineering interventions. Generally, Environment and Resources Authority (ERA) welcomes measure 2.2.1.2 which seeks to coordinate transport objectives with spatial planning policies in order to move towards the centralisation and accessibility of transport facilities in the Principal Urban Area (PUA) as a central hub.	Comment Noted. A point of clarification, the Master Plan analysis has identified an area designated as a new "Hub" (Fig. 24), and this measure is advocated by further decentralisation in relation to this hub within the PUA.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				The centralisation of further investment and measures in the PUA in terms of Public Transport and other sustainable modes of transport would indirectly relieve pressures for further transport-related infrastructural works and site engineering interventions in sensitive environmental areas and other rural locations. However, various measures in the draft Master Plan either individually or cumulatively could still result in significant environmental impacts. The issues and concerns highlighted below need to be considered further as part of the plan-level environmental assessments including SEA and finalisation of the plan.	
82	Chapter 2 Road Transport Measure 2.2.1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	We require a radical transformation in the land development permitting procedures to re-introduce and respect land use and transport planning. The single application process is deleterious to both the efficient use of and safeguarding of land and the provision of transport infrastructure. Holistic planning, such as the suggested Master Plan for Mriehel are a necessity. Even though with the approval of the first high-rise building any future master plan has already been undermined. The role of transport in the development of the Master Plans should also be made clearer in the manners of procedure and collaboration between entities such as TM, PA and Environment and Resources Authority (ERA).	Refer to Thematic Objective 11 of the SPED: "To facilitate the provision of an efficient transport service and other green modes" by "... requiring transport assessments for a wider range of travel generating schemes." This comment will also be referred to the relevant authority (PA).
83	Chapter 2 Road Transport Measure 2.2.1.3	Bicycle Advocacy Group (BAG)	22/07/2016	The current development of cycling in the Mriehel area and its increasing use can be seen in the Strava.com Street Heat Maps. Mriehel would appear to be somewhere to bypass by bike rather than actually visit. Yet there are plenty of cyclists on adjacent routes, indicating that it is potentially reachable.	Comment noted. This source of information will be referred to when developing 2.2.1.3.
84	Chapter 2 Road Transport	OPM Energy and Projects - Mriehel	16/08/2016	The internal transport infrastructure layout should also be evaluated for potential bottlenecks during the peak hours. This would require the building of a micro-simulation model of the internal network which	Comment noted. This will be done as part of the Master Plan process for Mriehel.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.2.1.3	Enterprise Zone		would be used to test different options concerning the 'internal zoning' of the zone. New junctions to access the Enterprise Zone should also be explored to create flowing traffic in and out of the Enterprise zone.	
85	Chapter 2 Road Transport Measure 2.2.1.3	OPM Energy and Projects - Mriehel Enterprise Zone	16/08/2016	<p>It would also be important for the plan to ensure that sufficient reserve capacity is available within and around the Enterprise Zone in order to make it easier for investment to adapt quickly to developments in both domestic and international markets.</p> <p>The discussion in the previous section brings to the fore the need for the proposed integrated plan to include provisions for flexibility with respect to its implementation and updating. As is noted above, the community of entrepreneurs who are currently, and will be, based in the Enterprise Zone are and will be involved in markets which are in a continuous state of flux. In addition to the abovementioned importance that should be given to reserve capacity of the infrastructure networks, the plan should also include provisions for the quick processing of proposals for new developments and modifications to existing ones and for the updating of the plan. This is one area in which the Foundation can make useful contributions. Another area where the Foundation can contribute is in ensuring that the approved Transport Master Plan is implemented and enforced.</p>	Comment noted. This should be done as part of the Master Plan process for Mriehel.
86	Chapter 2 Road Transport Measure 2.2.1.3	The Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal, nevertheless the master plan for Mriehel should mitigate the visual impacts the new tower blocks would have on the immediate surroundings. At the same time since Mriehel is earmarked to have a mixed use i.e. office, commercial and industrial premises it should be made clear that its prime use remains business related and should not in any way include residential units. Given that industrial and commercial space is limited, the Chamber believes that the whole site should remain earmarked for such	Comment noted. The proposal of the designation of land uses will be referred to the relevant competent authority (Planning Authority).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				use only.	
87	Chapter 2 Road Transport Measure 2.2.1.3	Bicycle Advocacy Group (BAG)	22/07/2016	Clearly cycling and particularly public bike share schemes fit the bill here quite well. Cycling avoids overloading neighbouring localities with traffic, is sustainable, low impact in terms of infrastructural cost and links well with other Public Transport hubs/modes. Re aligning the direction of internal roads to prioritize cyclists with help promote cycling and calm other traffic, alternatively bidirectionality of cycle traffic could be a feature, however the industrial nature of the environment needs to take into account how HGV's interface with bicycles. As such a key bike artery should be selected and subjected to segregated infrastructure. Ideally this should be a cycling superhighway, that is safe and encourages people to cycle because it is both safe and efficient, his could include Green Wave technology. Industrial and office employers should be encouraged to offer showers and changing facilities to bicycle commuters. The importance of weaving this into the tapestry of the Mriehel development cannot be over emphasized as a show case model of how to get it right. The current bolt-on approach, as an afterthought, sic 'an appropriate transport strategy... to be implemented for the area (Ibid), clearly demonstrates this by placing an emphasis on the inclusion of parking standards, traffic management, transit and finally 'facilities for cycling and walking' which in reality should be the first layer. Walking to the office even from a car park or park and ride must be pleasant, ditto cycling, because from the former all modes spring – otherwise we could hum 'Omm' and hover to work. Redesigning Mriehel is a unique opportunity to revise how we look at how people move about. As such cycling and walking facilities should not be an and. We should begin to view transport as a community of road users that integrates, not car-centric policies that allow or negotiate the integration of other modes.	The order of reference to different modes of transport has no bearing on their relative importance within the measure. Other comments noted and will be taken into consideration in the development of the Master plan for Mriehel.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
88	Chapter 2 Road Transport Measure 2.2.1.3	Environment and Resources Authority (ERA)	26/07/2016	With respect to measure 2.2.1.3 regarding the proposals for the Mriehel area, the Master Plan states that the designation of the Mriehel area as an Enterprise Hub in SPED will introduce a significant number of high traffic generating activities during peak hours which also means that such development growth could result in worsening of the current air quality levels in the area. Upgrading of road infrastructure will not necessarily address or avoid traffic-related air quality impacts in the area. In fact, any proposed upgrading to the Mriehel bypass which would result in additional take up of extensive tracts of undeveloped rural land would be of concern from an environmental point of view.	Comment noted. The measure focuses on an appropriate sustainable transport strategy that would mitigate impacts of traffic generation on the surrounding areas. Any transport infrastructure provision would be subject to the normal environmental assessments at a project level.
89	Chapter 2 Road Transport Measure 2.2.1.3 2.2.1.4 2.2.1.5	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	The intent to create Master Plans for Mriehel, Paceville and Sliema is very welcome showing that these areas are to be treated in a manner that deserves particular attention to the specificities and level of activity in these hubs. At this stage it is also however solicited that other main hubs such as Valletta are also included in the need to establish such a specific Master Plan.	Comment noted. This can be developed within the framework of "Strategy for Valletta 2016" prepared by the Planning Authority and the Office of the Principal Permanent Secretary.
90	Chapter 2 Road Transport Measure 2.2.1.3.	OPM Energy and Projects - Projects Malta	16/08/2016	Re reference to Mriehel Industrial Estate, one must note that Projects Malta Ltd and private enterprises in the area have created the Mriehel Enterprise Zone Foundation and Transport Malta has been included on the Board of Administrators, given that Transport planning and management is key to the long term success of this project	Comment noted.
91	Chapter 2 Road Transport Measure 2.2.1.3.	OPM Energy and Projects – Projects Malta	16/08/2016	The studies carried out by Transport Malta in the preparation of the Strategy and the TMP and transport impact studies commissioned by entrepreneurs based in the Enterprise Zone show clearly that the solution of the 'Mriehel transport problem' must involve a well-designed Public Transport system. This would definitely entail the location of a multi-modal hub within or very close to the zone. The hub	Comment noted. This has been addressed in Measure 2.2.1.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>would need to be well connected by means of alternative means of transport such as conventional bicycles, ped-electric bicycles and electric vans to all parts of the zone.</p> <p>If deemed necessary, the Foundation is prepared to explore possibilities through which the private sector investors could be involved. This is one area where the experience and knowhow of the members of the Foundation would prove to be useful.</p>	
92	Chapter 2 Road Transport Measure 2.2.1.3.	OPM Energy and Projects – Projects Malta	16/08/2016	During a previous meeting, mention was made of the need for the integrated plan which the Planning Authority is working on to be subject to some form of transport assessment. The Foundation supports this view, however, such an assessment should not be limited to the testing of the proposed plan with respect to the macro-simulation model.	Comment noted.
93	Chapter 2 Road Transport Measure 2.2.1.3.	OPM Energy and Projects – Projects Malta	16/08/2016	<p>The Foundation:</p> <ol style="list-style-type: none"> 1) recommends that Government fixes a time-frame for the approval of the Mrieħel Transport Master plan; 2) reiterates that a Brief or Inception Report be prepared jointly between the Planning Authority, Transport Malta, and the Foundation which, among other things, would establish a deadline for the completion of the plan[s] and clear milestones which would need to be attained in the process. 	Comment noted.
94	Chapter 2 Road Transport Measure 2.2.1.3; 2.2.1.5	Therese Bajada	07/07/2016	As in the case of the Master Plan for Paceville, St Julian’s transport measures should cater for alternative modes of transport for both Mrieħel, and Sliema (albeit, each case has a different setting and context). In the case of Sliema in particular the statement ‘to accommodate increased on-street parking’, encourages the use of the private car to reach Sliema. Visitors going to Sliema should be encouraged to use alternative transport modes, and this should be highlighted in measure 2.2.1.5.	Comment Noted. Measure 2.2.1.5 has been updated and alternative modes are emphasised

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
95	Chapter 2 Road Transport Measure 2.2.1.4	George Debono	18/07/2016	"... plans for the comprehensive designation of Paceville as a Business Hub –Urban Regeneration Priority Area, with the aim of promoting high quality business use, in particular in the tourism sector." and "Strategic Plan for the Environment and Development envisages the designation of Sliema centre as a Business Hub" Such statements seem counter intuitive to the principle of mixed use and rather seem to indicate a 'zoning' approach...	Comment noted, the definition of a business hub in the SPED incorporates mixed land-use.
96	Chapter 2 Road Transport Measure 2.2.1.4	George Debono	18/07/2016	"likely to become high quality enclaves in an otherwise haphazard surrounding. With the current level of transport infrastructure provision and service, any major new land use development in the Paceville area will have significant traffic impacts that extend well beyond the Paceville area." Agree	Comment noted.
97	Chapter 2 Road Transport Measure 2.2.1.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber cannot but agree with this stance as the situation in St Julians, specifically the Paceville area is in dire need of a strategic plan to mitigate traffic flows.	Comment noted.
98	Chapter 2 Road Transport Measure 2.2.1.4	Bicycle Advocacy Group (BAG)	22/07/2016	This was most keenly felt by cyclists when they lost the local councils rather pragmatic provision to use the Promenade at slow speeds. In the subsequent negotiations with TM road measurements indicated that there was not enough space for cyclists to be passed safely by car traffic for a large percentage of its length, while it was found that for HGV's and PSV's could only pass safely along 4% of the road. Calls for lowered speed limits to facilitate a safe passing distance were ignored because TM "did not want to slow traffic down". Having pushed cyclists off the safer Promenade and onto a known dangerous road space, TM's response was to ask "why would a cyclist want to use such a dangerous road?". The obvious answer was "to get to the other end, just like	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>anyone else?”</p> <p>Alternative routes are few and far between. While the Master Plan points out that roads were often made one-way (to the detriment of cyclists) to ‘accommodate increased on-street parking (TMMP, 2016: 68)’ means that most if not all ‘of the local roads in the area today are one-way’ (Ibid). This is a triple whammy for cyclists as they therefore have to deal with; Extended trips taking un-necessary detours (ultimately because of parking demand) Double the dooring hazard (from both sides) on artificially narrowed streets. Extended numbers of climbs up hills due to convoluted local routes. Coupled to this is the lack of pedestrian and cyclist priority and value-of-time (See 2.1.6) in designing and assessing desire lines it is little wonder that road users favour using cars for most trips. This is not a criticism of the master plan but a simple observation of one of the significant barriers that the master plan needs to overcome. In recognising this perspective the BAG fully support the master plan concept of Sliema needing to take a different approach to past car centric models.</p>	
99	Chapter 2 Road Transport Measure 2.2.1.5	Bicycle Advocacy Group (BAG)	22/07/2016	<p>The Master Plan cites that ‘At the current level of growth, by the year 2025, Tower Road and the Strand in Sliema will reach their practical operating capacities’ (ibid). Clearly there needs to be a shift in on-street parking to parking strategies on the periphery which could free space on Tower and the Strand for cycle friendly alternative infrastructures like a cycling superhighway that could potentially connect with Pembroke via St Julian’s and Valletta or even as far away as the Three Cities utilizing promenade areas in the Valletta rehabilitation project. One of the solutions offered in the past was to redefine Tower road and possibly the Strand as a shared space in the same way that the Promenade in Naples has been. The Strategic Plan for the Environment and Development, in line with 2.2.1.2 must seek to integrate cycling and PBS into the ‘sustainable transport growth and provision’ (ibid) for Sliema in the near future. BAG would tend to support this position</p>	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				taken by the master plan.	
100	Chapter 2 Road Transport Measure 2.2.1.5	Bicycle Advocacy Group (BAG)	22/07/2016	<p>BAG would tend to support this position taken by the master plan. Once again there has been significant development of cycling in and around St Julian's, despite its difficulties and relatively poor level of cycling infrastructure provision, admittedly common to all other local councils. The Strava tool once again demonstrates the development of cycling trips between 2014 and 2015. St Julian's too has seen an unprecedented growth in cycling, the only route in decline being through the valley to San Gwann, due to road construction works. Graphics Strava.com. Compare the number of routes used in the urban areas of Pembroke compared to say the Village or other urban cores in St Julian's. A significant number also clearly use the Regional road and that number is growing, possibly due to the links to the Coast road infrastructure.</p> <p>In comparison to Sliema many streets in St Julian's do not have footpaths or those that are so narrow as to be ledges to rest anything other than pedestrians, forcing the latter to walk in the road. In both cases, cars force their way past pedestrians in the older parts of the village while St Georges Road in Paceville is a literal free for all. The latter strongly lends itself to becoming a shared pedestrian space. BAG would tend to support this position taken by the master plan.</p>	Comment noted. This data will be used in the development of the master plan.
101	Chapter 2 Road Transport Measure 2.2.1.5	Bicycle Advocacy Group (BAG)	22/07/2016	<p>While some cycling use in Sliema is encouraging, cross town traffic is notable by its absence when looking at Strava data. We need to be mindful of the fact that cycling traffic along both the Promenade and Strand has clearly increased significantly, a large proportion would appear to be using the Tigne tunnel as opposed St Antnin the only legal route out of Sliema towards Gzira.</p>	Comment Noted. This source of information will be referred to when developing 2.2.1.3.
102	Chapter 2	Malta Chamber of	13/07/2016	As with the above mentioned masterplans, Sliema is also in dire need of one which takes into account current and future developments in this	Comment noted. This comment relating to land use planning will be

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Road Transport Measure 2.2.1.5	Commerce, Enterprise and Industry		<p>town especially around the Qui-Si-Sana and Tigne' Peninsula. The Malta Chamber is not against the development of such zones which would be earmarked for high rising towers with mixed use but the Chamber is concerned that continued development in the area will have negative repercussions on the surrounding retail, tourism and residential units which are already facing traffic and congestion and linked emissions on a daily basis.</p> <p>Without prejudice to any future development, the authorities need to make sure that every new development undergoes a rigid Environmental and societal impact assessment which would show the impact such large projects would have on their surroundings. One must also recall that the current road infrastructure in those two areas are mainly made up of one lane streets in which increased traffic flows would jam the whole peninsula.</p>	referred to the competent relevant authority (Planning Authority).
103	Chapter 2 Road Transport Measure 2.2.1.6	Therese Bajada	07/07/2016	<p>Ensure that the process of inclusivity is implemented:</p> <ul style="list-style-type: none"> i) For all projects. ii) Following guidelines that are adaptable and interdisciplinary, and that are not bureaucratic. iii) Use small cases as examples to build upon, even to test the guidelines and the policies. iv) Make sure that the relevant authorities (e.g. PA, Environment and Resources Authority (ERA), TM) have the required policies available, and that they work in synergy to implement such processes. 	Comment noted. Transport Malta actively tries to make transport policy that is as inclusive as possible.
104	Chapter 2 Road	Bicycle Advocacy Group (BAG)	22/07/2016	This most significant statement is indicative of an inability in the past to think past prioritizing car use, or more fairly, being allowed to think past it. Even when considering alternatives such as mass transit, the	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Measure 2.2.1.6			<p>implications of how to reach that and how conducive walking infrastructure is to and has suffered because of, an inability to design for people in inner city landscapes. Pedestrians are often constrained to walk in fear of and subservient to cars. Even when the infrastructure warrants pedestrian priority.</p> <p>BAG is in a unique position as an advocacy towards modal shift to confirm that most of the rhetoric used to deny the practicality of cycling has been based upon arguments that could equally be used against transit options. Physical effort of getting there, efficiency (a believed slowness) and lack of task flexibility. Some commentators cite a perceived lack of safety. Transit options will run into the self-same problem areas. Transit however still needs to be reached. It cannot work if patrons cannot access it. Just as cycling suffers from a lack of a network of routes so too does the bus service from a poor network of footpaths and pedestrian infrastructure that facilitates bus use (and indeed walking), particularly its initial and final stages, commonly known as the last mile conundrum. BAG would tend to support this position taken by the master plan.</p>	
105	Chapter 2 Road Transport Measure 2.2.1.6	Bicycle Advocacy Group (BAG)	22/07/2016	<p>Importantly we need to address not just the needs of pedestrians and transit, and for that matter cyclists, but their desires as well. Much greater emphasis needs to be placed upon pedestrian and cyclists desire lines. Bending car driving infrastructure in towns to their needs and designing around people rather than engineering around cars. The Master Plan clearly appears for the first time to align with this way of thinking, stating that 'The lack of integration between the urban planning and design process and the transport planning and design process gives rise to sustainable development issues, many of which could be avoided if addressed earlier in the process.' (Ibid: 68)</p> <p>Significantly in the examples noted on the Strava heat maps above, even given the effects of dissipation of bicycle traffic at destination, very few cyclists can be seen moving through village cores or towns.</p>	Comment Noted. Measure 2.2.1.6 has been updated to make specific reference to Desire Lines.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				Bags experience reveals that cyclists suffer when direct routes are closed off due to one way systems or pedestrian routes, thus having to take a longer route. The implications of such measures for cyclists are not considered. Safety and efficiency need to work hand in hand.	
106	Chapter 2 Road Transport Measure 2.2.1.6	Bicycle Advocacy Group (BAG)	22/07/2016	In a study undertaken in 2014, an attempt was made to contact each local council with a view to exploring how many had a simple route through their city or town that could be prioritized from North to South and East to West and vice versa. Only three (3) local councils replied, and then only to ask how this could be achieved. While specific master plan actions have been identified for Mriehel, Sliema and St Julians/Paceville, there needs to be localised cycling master plans in each and every locality, to identify safe and efficient cycling corridors, even if the scope for infrastructure is limited. Very simple methods exist like walking speed bi-directionality for bicycles, perhaps stopping and giving way to cars. Allowing cyclists to use 'residents only one way streets'. Creating false one ways by placing bollards at one end of a road (this was the first method used to introduce this in Germany).	Comment Noted. Measure 2.2.1.6 will address this through the identification of a cycling route network as well as design principles for the provision of cycle-friendly streets. This is seen as being in line with the feedback given.
107	Chapter 2 Road Transport Measure 2.2.1.6	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this measure but requires further detail on which roles and professions would be included in the multi-disciplinary taskforces.	Comment noted. This information will be released in due course.
108	Chapter 2 Road Transport Measure	Malta Chamber For Small & Medium Enterprises	18/08/2016	This is a positive approach as interdisciplinary teams would result in effective results which take all considerations. To have an on-the-ground approach it is essential to have a wide-range of operators who have their business running day-in and day-out in our roads, to be part of the team, as they would have important data and insights to provide	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.1.6	(GRTU)		which cannot be derived from desk research.	
109	Chapter 2 Road Transport Measure 2.2.1.7	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	<p>Authorities that close roads need to communicate and coordinate together in practice. It cannot be that whilst a main road is closed due to road works, and a secondary road is closed due to emergency water works, the third and last option is granted permission for closure and during peak-hours by the Local Council, which is oblivious of the other closures. In the immediate, there needs to be a contact person at each entity, yet in the longer term this can be solved through a live-map-based online system which shows entities which roads are closed in the vicinity prior to issuing permits. In any case, partial or full road closure should only be allowed for the time necessary and not for time which is not proportionate to the works to be undertaken, and should nonetheless be directed as much as possible towards off-peak hours.</p> <p>There is also clear need that in areas effected directly by national projects such as the Kappara Junction Project, the former Coast Road Project, and upcoming projects such Marsa Flyover Project, there is a coordinated approach ideally through one entity. The traffic disruptions caused by the traffic management system applied during the project duration cannot afford to be hindered or effected by other road closures. Malta Chamber For Small & Medium Enterprises (GRTU) had proposed that Transport Malta would have a Centralised Approval and Information Centre for Road Closures. This would be in relation to major project cases effecting the country's infrastructure, whereby Local Councils and any other authorities would need final go ahead from TM to effect road closures and also give the opportunity to inform businesses, logistics operators and the general public in due time. This TM unit would be able to best asses how and when specific roads can be closed or partially-closed, whilst also allocate alternative routes and measures, since it would be taking decisions with the possibility of</p>	Comment noted. This is addressed in Measure 2.2.1.7, which aims to improve the coordination and planning with entities responsible for service, utilities and infrastructure. In addition, Measure 2.2.11.4 which aims to introduce a more technological approach through transport modelling and GIS in the planning for diversion routes and road works.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				having a bird's eye-view.	
110	Chapter 2 Road Transport Measure 2.2.1.7	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this measure.	Comment noted.
111	Chapter 2 Road Transport Measure 2.2.1.7 2.2.9.2	Karen M. Zammit Manduca	19/07/2016	<p>When building new roads, it would be far better were services buried beneath pavements, rather than run down the centre of the road, as many are now. This will be less disruptive to traffic when repairs are necessary, and the road surface will remain in a better state of repair for longer, since surfaces will not need to be disturbed and patched up frequently.</p> <p>Pavements could be constructed in such a way as to have a cavity or 'tunnel' for the services to run through, slabs to cover the cavity, stone chippings / fine material to cover the slabs, and then concrete paving tiles to finish off. Subsequent need to excavate for repairs would necessitate the removal, and possible breakage, of only a couple of tiles, because the rest can then be removed without breakage and can be reused. Most other material can also be reused once repairs have been carried out – a less costly solution in the long run. Although the initial expense to run two sets of essential services, water mains, sewage drains etc, will be higher, costs can be saved over time while the road remains better for longer. Traffic disruption will be minimal since most work can take place on the pavement and not in the road.</p>	Comment noted. These are addressed in Measure 2.2.1.7 and Measure 2.2.9.2
112	Chapter 2 Road	Therese Bajada	07/07/2016	Include the collection of data similar to EU data (e.g. vehicle km by mode of transport); this would help compare data, and use the data for monitoring.	Comment Noted. The National Transport Model has facilitated the provision of data such as vehicle kms and passenger kms at

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Measure 2.2.1.8				a country level.
113	Chapter 2 Road Transport Measure 2.2.1.8	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)		<p>There are many debates about the validity and effectiveness of National Household Travel Surveys as measures of travel behaviour. There are other means of collecting travel behaviour data which are technologically driven. Mobility collectors are such methods. The Institute has developed its first mobility collector VJAGG which is aimed for the collection of journey information through smart phone technologies.</p> <p>Investments in such initiatives would see the further development of such technologies for the purpose of decision making.</p> <p>See more at http://www.um.edu.mt/University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)/projects/demandresponsivetransport/vjagg</p>	Comment Noted. New Measure 2.2.1.9 has been implemented to use new technologies and inclusion of other groups such as tourists and freight operators that are not effectively covered by the NHTS.
114	Chapter 2 Road Transport Measure 2.2.1.8	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	National Household Travel Survey includes important data but it may exclude exceptionally important information from stakeholders which may not be represented by the in the NHTS. There is definitely a need to conduct data collection amongst the business sector in order to be able to reflect a more realistic picture. If a business operator in the transport and logistics sector is reached through the NHTS, the said operator would report on his personal use of transport and not on the realities of that borne by their business. This may include private collective transport, goods delivery, employees using company cars, etc. Failure to include such would not be painting anything close to the real picture of transport/travel on our islands as this is substantial.	Comment Noted. New Measure 2.2.1.9 has been implemented to use new technologies and inclusion of other groups such as tourists and freight operators that are not effectively covered by the NHTS.
115	Chapter 2 Road	Bicycle Advocacy Group (BAG)	22/07/2016	The Master plan cites a 10-year periodicity in between data collection of travel patterns and this is far too long to be an effective tool in measuring travel patterns. The use of the Vjagg App and other BIG	Comment Noted. New Measure 2.2.1.9 has been implemented to use new technologies and inclusion of other groups

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Measure 2.2.1.8			DATA sources should be explored. In addition, previous household survey questionnaires have been very poor in terms of addressing bicycle use, limiting themselves to questions like do you use your bike to go to work/school and do you use your bike in the evening, leaving out whole swathes of potential cyclist who may use them for errands or for sport or as a pastime. Such questions may have elicited and identified the potential bicycle modal shift held within the sports cycling fraternity and how many people would be willing to use one for short trips, such as use a PBS system. In addition, the MNAP survey was separate (yet this indicated a 28% cohort whom were willing to invest in cycling a pedelec – which is a huge potential market) and should be integrated into any future survey not treated as a standalone product.	such as tourists and freight operators that are not effectively covered by the NHTS.
116	Chapter 2 Road Transport Measure 2.2.1.8.	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	In tackling mobility on the island it is critical to include all types of travellers. The over reliance on the NHTS data excludes over 1.5 million tourists that visit the islands and use the transport infrastructure. These users exert significant pressures on our infrastructure, especially Public Transport systems. Efforts should be made to retain the current high levels of Public Transport use by tourists. Current research shows a slight shift in the modal split for tourists over the past few years. <i>Attard, M. (2016) The relationship between Public Transport and tourism in the small island state of Malta. Paper presented at the 2016 World Conference on Transport Research (WCTR2016) organized by the WCTR, held in Shanghai, China, 10-15 July. See Figure 4 page 9.</i>	Comment Noted. New Measure 2.2.1.9 has been implemented to use new technologies and inclusion of other groups such as tourists and freight operators that are not effectively covered by the NHTS.
117	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	The 'Home Zone System' (German 'Wohnstrasse' or Dutch 'Woonerf') is a similar approach aimed at improving the quality of life of street residents. It allows quality of life to take precedence over traffic movement in quiet streets by giving children and pedestrians priority over motorists and cyclists (who may only proceed at strictly controlled slow speeds) so that children can play safely outside. Such areas have no pavements, the road surface or texture is changed, typically with	Comment noted. This has been addressed in new Measures 2.2.5.4, 2.2.5.5 and 2.2.5.6.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				brick or tiles, to make the car-ride noisy and prompt motorists to drive at a slow speed. Trees are planted and benches installed. Vehicles may proceed at walking speed. Such streets might also be closed to through traffic and non-residents are not allowed to park their car. Such arrangements are being introduced in Australia, Germany, The Netherlands, New Zealand, Sweden, the United Kingdom, Switzerland, the United States and other countries as far away as Japan. They are now commonplace in some of these countries.	
118	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	Quiet roads in urban neighbourhoods generally do not require cycle lanes. As described in the preceding section on private transport, considerable alterations to the streets themselves are created to promote cycling (these are described) in many European cities, especially in Holland,. These include road narrowing, raised intersections and crosswalks, traffic circles, extra curves and zigzag routes and artificial dead ends created by mid-block street closures. Cycling is almost always allowed in both directions on all such traffic-calmed streets, even when they are restricted to one-way travel for cars. This further enhances the flexibility of bike travel.	Comment Noted. Refer to Measure 2.2.2.4. and the development of design principles for the provision of Cycle Friendly Streets. Measure 2.2.5.1 will also incorporate cycling. Contra flows on low/speed urban roads will be technically assessed as part of Measure 2.2.2.4
119	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	With regard to cycling, the provision of cycling infrastructure is fragmented and does not penetrate the main urban area. This is so, but it is difficult or impossible to create cycle infrastructure in most urban contexts. The primary aim should be to make using a bicycle for short trips as informal and as positive experience (i.e. safer) by means of traffic calming, speed limits etc. Cycling infrastructure is important on main or commuting roads; many of these are wide enough – or have a wide enough pavement to permit retro-fitting cycle lanes or tracks (as is the pavement which borders the congested main road between Msida and Floriana. It might also be possible to create purpose-built off-road cycle trails or paths away from traffic between villages and towns to encourage children to cycle. Provision of ‘cycle parks’ or isolated	Comment Noted. Refer to Measure 2.2.2.4. and the development of design principles for the provision of Cycle Friendly Streets. Measure 2.2.5.1 will also incorporate cycling.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				'cycle tracks' which can only be reached by car meant to encourage children to cycle are of little use as they result in fragmented cycle amenities which are out of reach of the young. If children are to be encouraged to go out or use a bicycle, safety of cycling must start at their doorstep – for which our streets need to be made safer.	
120	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	There is also a lack of comprehensive guidance on designing for cycling infrastructure or cycle friendly streets.....This is indeed the case. There are too many instances where arbitrary decisions are made by transport planners who are not in the least acquainted with the needs (or, indeed, health benefits) of bicycle use. This must be remedied.	Refer to Measure 2.2.2.4 - National Cycling Strategy - Design guidance is planned as part of this measure.
121	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	Contraflows: A problem faced daily by bicycle commuters is One Way Streets (OWSs). Motorists regularly excoriate the occasional cyclists who ride contrary to the flow in OWSs. These cyclists do this to save themselves a long detour. Basically introduction (seen as anathema in Malta) is necessary if cycling is to become a realistic alternative transport option for short trips. The default position in towns in Belgium and France has been for one-way streets to be available for cycling in either direction in one way streets. Contraflow cycle lanes are now common in many other countries and being introduced more widely. Contraflows are usually indicated by symbols painted on the road surface or road signs. Evaluation of contraflows suggests that these reduce the accidents risk. Contraflows have a number of advantages and safety features.	Comment Noted. Contra flows on low/speed urban roads will be technically assessed as part of Measure 2.2.2.4
122	Chapter 2 Road Transport Objective 2.2.2	Ministry for Sustainable Development, the Environment and Climate	17/08/2016	The plan mentions the lack of pavement infrastructure and walking / cycling accessibility but fails to mention how these are going to be tackled in core urban zones.	Comment Noted. This is addressed in Measure 2.2.2.3, 2.2.2.4, 2.2.2.5, 2.2.2.6, 2.2.2.7, 2.2.3.1, 2.2.5.1. Three new measures have also been added; please refer to 2.2.5.4, 2.2.5.5 and 2.2.5.6.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		change (MSDEC)			
123	Chapter 2 Road Transport Objective 2.2.2	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	Are measures to promote urban greening being considered to improve the environmental quality of transport corridors?	Comment Noted. Included in revised draft Transport Master Plan under Measure 2.2.5.1.
124	Chapter 2 Road Transport Objective 2.2.2.	Therese Bajada	07/07/2016	The 10 minute walk drawn on the map seems to include a buffer that is a straight line (Cartesian distance). The ten minute walk would ideally follow the Manhattan distance to identify exactly the accessibility issues that infrastructure users face (in the case of the map in Figure 15 the retail areas); this would enhance the statements made in subsequent paragraphs.	Comment noted. However, while the Manhattan distance would be more exact, the current analysis illustrates the principle.
125	Chapter 2 Road Transport Objective 2.2.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This is an important point that could potentially provide traffic reduction. Nevertheless, the fact remains that our population is not all geared to use walking and cycling even if the infrastructure is improved. Therefore hand-in-hand with the improvements to improve walking and cycling figures, we also need to consider the introduction of private collective transport which is efficient and reliable. With reference to page 73 final paragraph, this shows that such service is in fact an option considered but it could be that Maltese commuters do not opt to use such services due to lack of awareness and affordability.	Comment noted.
126	Chapter 2 Road Transport	Bicycle Advocacy Group (BAG)	22/07/2016	Re. local level mobility and modal split for Fgura and Sliema - The Strava data showing cycling growth from 2014 to 2015 in Sliema would seem to support this quite strongly, but much needs to be done to improve the infrastructure and resident's acceptance of cycling. While some use	Comments noted. This will be taken into account in Measure 2.2.2.4.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.2.2			in Sliema is encouraging, cross town traffic is notable by its absence in the residential areas. Looking at Fgura where the TMMP shows that car modal share is 47% within the walking catchment area and 59% within the cycling catchment area, in both Sliema's and Fgura's case cycling modality is slightly more consistent 59%-60%. However, in Fgura there is slightly more diversity of routes, but largely aimed at bypassing the main shopping areas where these occur. Although as stated in the Transport Plan that 'this illustrates the potential to prioritise walking, cycling and Public Transport modes within the walking and cycling catchments of these retail areas, thus relieving the need for travel by private vehicle' (Ibid: 72) far more needs to be done to encourage acceptance of arriving at one's destination by bicycle.	
127	Chapter 2 Road Transport Objective 2.2.2	Bicycle Advocacy Group (BAG)	22/07/2016	Very few destinations offer good quality up-front bicycle infrastructure, most being cheap spiral 'wheel breaker' racks hidden from view or distant from shop frontage, which turns a simple bicycle car reducing errand into a multimodal theft-stress deterrent. The potential is there but like car traffic it is largely passing traffic. The challenge is how to make bikes stop and spend? This relies on bikes becoming hip or trendy ways to get around again. Up-front and funky. The report correctly states that 'the space allocated for vehicles and pedestrians is not balanced and vehicles are given priority. This diminishes the walkability of urban areas and has reinforced the cultural mind-set towards the use of private vehicles in favour of walking.' (TMMP, 2016: 73) The report states that 'the provision of cycling infrastructure is fragmented and does not penetrate the main urban area (Figure 19). There is also a lack of comprehensive guidance on designing for cycling infrastructure or cycle friendly streets and the strict regulatory framework for cycling, and battery-powered two-wheelers, may discourage the uptake and use of such modes.' (TMMP, 2016: 73). BAG would tend to support this position taken by the master	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				plan.	
128	Chapter 2 Road Transport Objective 2.2.2	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	A study should also be undertaken of private sector solutions in use in other cities (e.g. car-on-demand operations), or of other incentives (e.g. analysis of some form of taxi subsidisation for occasional use) to reduce the need for car ownership or use or to make lack of car ownership more affordable in the long term.	Comment noted. Will replace "Smaller Vehicles" with "Alternative Modes" in Measure 2.2.2.2.
129	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	This an excellent assessment of the problems and summary of issues which constrain the alternative mobility. Some issues merit detailed comments: I car-share as often as I can. What is discouraging is standing on a desolate pavement in a desolate road waiting for a colleague (in his car) to arrive & pick me up – would car sharing be a better experience if we had benches here and there and trees (for shade) where one can sit & maybe read a newspaper while waiting? (the devil is in the detail!). "Street furniture" as benches is an important element of the 'shared space' design which helps make streets more attractive and sociable.	Comment Noted. Measure 2.2.5.1 addresses this issue by developing guidelines for urban streets and Measure 2.2.5.4 has been added to emphasise the importance and potential for shared space / home zones where appropriate.
130	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	Agree in principle: But surely the question here is one of altering the design of urban/residential streets away from the age-old separation into a car (traffic) space and pavement (people space) and towards the shared space/home zone concept which is friendlier and safer for children and the aged? Parking space need not be sacrificed. A meaningful definition of home zone is "turning (residential) streets into everybody's front garden"	Comment noted. Your feedback has been included under new Measures 2.2.5.4 , 2.2.5.5 and 2.2.5.6
131	Chapter 2 Road Transport	George Debono	18/07/2016	<i>"There is also a lack of awareness regarding the impact of travel behaviour on health and environmental issues."</i> It also results in economic benefit from health savings.	Comment noted. This sentence has been amended to include the economic benefits from health savings

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.2.2				
132	Chapter 2 Road Transport Objective 2.2.2	George Debono	18/07/2016	<p>".....and the strict regulatory framework for cycling, and battery-powered two-wheelers, may discourage the uptake and use of such modes.... Such a measure, also requires a review of the existing regulatory framework relating to pedestrians, bicycles, battery powered bicycles, etc. with the aim of facilitating greater uptake of these modes, while not compromising road safety" -</p> <p>Absolutely agree: The potential of this mobility option to reduce traffic congestion is considered by the EU to be of such importance that pedelecs (as defined above) have been freed from all bureaucratic constraints. The EU treats them as normal pedal bicycles in order to encourage their uptake. There has been a good response and pedelec sales are surging ahead in Europe. Worldwide the sales of electric bicycles are also burgeoning in response to worsening traffic congestion in major cities which is pushing people toward other transport options. There are two regulatory obstacles to would-be buyers of pedelecs in Malta: the need to register pedelecs; obligatory helmet wear. These deter people from purchasing and using pedelecs. This restriction must be lifted and brought into line with Article 1 (h) of EU Directive 2002/24 (or any updates of this directive) so that Pedelecs are exempted from Type Approval in order that they may be bought over the counter in the same way as a pedal bicycle.</p>	Comment noted. This is addressed in Measure 2.2.2.4.
133	Chapter 2 Road Transport Measure 2.2.2.1	Therese Bajada	07/07/2016	Information should be available for every mode user, to encourage intermodality. If the idea is to try to improve modal shift away from the car, car users should have the information visible – marketing should be subtle but targeted. Regarding information, there is the need to ensure that online information is up-to-date, including the "tallinja app", which seems to have missing information in some localities, and not all features seem to work properly. Constant monitoring and testing needs	Comment noted. This is generally covered in Measure 2.2.2.1.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				to be done by both the regulator and operator (for cross-checking, and to ensure that the operator does the necessary updates). While information is beneficial to have in any way possible, it is also important to keep personal contact available (not necessarily through the bus driver); both Maltese citizens/residents and Tourists prefer to ask questions to the bus driver. This issue needs to be addressed because it saves time to on-board vehicle waiting times that influences the trip length.	
134	Chapter 2 Road Transport Measure 2.2.2.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees to invest more in raising awareness especially amongst new and young drivers given that the majority of fatalities on the road occur during the weekend. The Chamber is also of the belief that the driving (both practical and theoretical) exam should be made more difficult in order and that more resources are dedicated to enforcement officers to issue fines on the spot especially when catching drivers using mobile phones whilst driving. The Chamber believes that such fines should be increased further. Technology such as CCTV should also be installed on major road nodes such as Msida, Mriehel, Sliema, St Julians, Marsa etc to oversee any contraventions on the road.	Comment noted. Improving the effectiveness of driver training and improving the effectiveness of the assessment of new drivers are strategy objectives of the Road Safety Strategy 2014-2024. In addition, the Road Safety Strategy acknowledges the higher risk of traffic collisions by young drivers and also contains strategy actions to address this. The implementation of the Road Safety Strategy is addressed in Measure 2.2.10.1 of the Master Plan. A review of fine levels is addressed in Measure 2.2.12.5. The use of CCTV for enforcement is addressed in Measure 2.2.11.1 and 2.3.4.2.
135	Chapter 2 Road Transport Measure	George Debono	18/07/2016	<i>"b) improved knowledge and social conscience on travel behaviour and sustainable mobility and to change driver behaviour and speed in urban streets;"</i> Apart from strengthening enforcement (i.e. compliance), traffic calming	Comment noted. Measure 2.2.5.1 will address this issue by developing guidelines for urban streets and measure 2.2.5.3 has been added to emphasise the importance and potential for shared space

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.2.1			<p>combined with 30 km/h urban speed limits (a generalised urban 30km/h limit is not enforceable and would merely be nominal without added traffic calming which includes conversion to shared space) are essential for modifying driver behaviour. This adds to the child safety factor on urban roads. Creation of urban shared space even in congested roads does not slow traffic down; vehicle speeds are reduced but flow improves so the net effect is comparable transit time with a safer traffic situation. This was discussed during a Seminar on 'Creating Streets for all users' organized by the Kamra Tal-Periti (Chamber of Architects & Civil Engineers) (Chamber of Architects & Civil Engineers) (12th June 2013) at which modern approaches to urban design and mobility were advocated by the key speakers. Tim Pharoah, an expert urban planner, was guest speaker. There is as yet no sign of implementation of any of the proposals suggestions which arose out of this seminar.</p> <p>A major deficit in the plan is the scant attention to modern urban road design. It is integral to child safety.</p>	/ home zones where appropriate.
136	<p>Chapter 2</p> <p>Road Transport</p> <p>Measure 2.2.2.1</p>	Daniel Cauchi	15/07/2016	<p>Entrenched cultural attitudes are hard to change, often requiring decade-long efforts that target children. In the Netherlands and Germany – including the use of fun apps - (apologies for the links; I was unable to find an 'official' link in English), all children undergo a 'cycling exam' at an early age. This leads to a certificate, and there is also some social pressure to pass this exam. I am aware that TM offers some children in Malta the opportunity to cycle in a safe environment and that officials demonstrate how to cycle safely at school premises, however such one-off demonstrations (particularly when children are not allowed to cycle on the roads by parents concerned about traffic hazard) do little to reinforce positive attitudes towards cyclists. A more long term strategy is required. Unless such measures are taken, cycling is unlikely to reach critical mass in Malta.</p>	<p>Comment noted. The issue of awareness campaigns to improve compliance with traffic rules and regulations for safety of all road users in Measure 2.2.2.1.</p>

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
137	Chapter 2 Road Transport Measure 2.2.2.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This is a positive, necessary measure It is also necessary to see that this is practical and on-the-ground using channels accessible to the public and facilitating them with videos and graphics.	Comment noted.
138	Chapter 2 Road Transport Measure 2.2.2.1	Bicycle Advocacy Group (BAG)	22/07/2016	Clearly there needs to be a more holistic and intra generational approach. The health, economic, environmental and transport benefits point to a pan-ministerial approach and the adoption of a cycling czar to cross pollinate ideas and responses. BAG would tend to support this position taken by the master plan.	Comment noted.
139	Chapter 2 Road Transport Measure 2.2.2.1.	Daniel Cauchi	15/07/2016	Education: Clearly, education of motor vehicle drivers, cyclists and pedestrians is a central component of any strategy. All road users need to be taught mutual respect, and car drivers in particular should be taught to actively look out for cyclists at an early stage. This can be done through a number of measures:	Comment noted. This addressed under Measure 2.2.2.1.
140	Chapter 2 Road Transport Measure 2.2.2.1	Motor Insurance Association (MIA)	22/07/2016	There is little doubt that driver behaviour contributes greatly to how efficiently traffic flows and to the risk of accidents occurring. This behaviour is shaped by many factors, including the quality of driving tuition received, continuing driver education, the level of awareness of the driver of how to drive safely and, in particular, the efficient enforcement of traffic rules and regulations by the authorities.	Comment noted. This addressed under Measure 2.2.2.1.
141	Chapter 2 Road Transport Measure	Nicholas Ponniah, CorporateVIP	27/06/2016	Proposal to introduce car pooling with employee Benefit schemes	Comment noted. This has been addressed in Measure 2.2.2.2.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.2.2				
142	Chapter 2 Road Transport Measure 2.2.2.2	George Debono	18/07/2016	"Rewarding companies implementing 'Green Travel Plans'" - "Bike2work" schemes are increasingly being introduced. Another system is allocation of parking space (by issuing windscreen disc parking permits) only to commuters who live beyond a certain distance, say, 6 km as measured radially. This is only feasible with companies large enough to have a company car park. This system is highly feasible for the university campus and it would help starting a trend towards students cycling in to the campus.	Comment noted. Revised draft has been amended to reflect this under Measure 2.2.2.2.
143	Chapter 2 Road Transport Measure 2.2.2.2	Karen M. Zammit Manduca	19/07/2016	The eCommerce and eGovernment online 'travel avoidance initiatives' mentioned on page 78 need to take a wider and a more holistic approach to the issue, i.e. consultation with other entities in order to find further ways of reducing the need to travel. To give a couple of examples, MCAST, Life Long Learning Directorate and Malta Air Traffic Services Ltd. (MATS)EC all require that certificates are collected in person, from Floriana in the case of LLL and Malta Air Traffic Services Ltd. (MATS)EC, or Paola in the case of MCAST. Sending these certificates by post will save several thousands of trips to these places each year, even if it is necessary to charge a fee to cover registered postage costs (so that there cannot be the excuse that certificates were not received) and for a card backed envelope, so that certificates are not bent. Alternatively, certificates can be distributed in bulk to locality post offices for collection from there, possibly resulting in a substantial amount of certificates being collected by people on foot. The same goes for things like payments that cannot be made on line. About two years ago, I needed to pay for a short LLL course. The person who phoned me told me I should go to Floriana to pay for the course. I asked whether I could post a cheque, but the reply given was that, "it may not arrive", and that, "those were the orders from above", even	Comment noted. Such initiatives will be covered under Measure 2.2.2.2.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				though I offered to send it by registered mail. This is all extra traffic, especially for those who depend on a car to go everywhere due to mobility problems.	
144	Chapter 2 Road Transport Measure 2.2.2.2	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	Mentions Green Travel Plans and perhaps there are merits in developing the concept somewhat further from an environmental dimension .	Comment noted. Transport Malta will coordinate with Ministry for Sustainable Development, the Environment and Climate change (MSDEC) to incorporate the environmental dimension into guidelines for Green Travel Plans.
145	Chapter 2 Road Transport Measure 2.2.2.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	<p>The Chamber agrees with the proposed measures but these should include both carrot and stick actions in order to incentivise more people to make use of alternatives modes of transport. At the same time, these modes of transport need to become as efficient as possible and where possible faster than the alternative of using one’s vehicle. A case in point which has been very effective over the last few years, is the marsamxetto and grand harbour ferry service which is more effective than driving when one takes into account financial and time consideration especially for commuters from Sliema to Valletta and the 3 cities to Valletta. Unfortunately, the services remains underutilised during the peak hours of the morning and late afternoon.</p> <p>Another potential scheme is the introduction of free or subsidized transport to workers in Industrial Parks amongst others. Many areas such as industrial parks provide concentrated areas where workers commute on a daily basis. Free Public Transport or incentivising car-pooling amongst employees to and from work at certain strategic times</p>	<p>Comment noted. Improving utilisation of the Inner Harbour ferry service is the overarching objective of Measure 2.4.2.1, whereas improving awareness regarding the benefits of using public transport is addressed in Measure 2.2.2.1.</p> <p>Encouraging car-pooling and other policies to encourage drivers to travel more efficiently is the objective of Measure 2.2.2.2.</p>

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				directly to these areas would remedy the afore mentioned issues, as well as have a perceivable benefit by reducing traffic for the rest of the population.	
146	Chapter 2 Road Transport Measure 2.2.2.2	Bicycle Advocacy Group (BAG)	22/07/2016	BAG would tend to support this position taken by the master plan.	Comment noted.
147	Chapter 2 Road Transport Measure 2.2.2.2.	Ministry for Finance (MFIN)	05/08/2016	Lastly, mention was also made of fiscal measures to be offered to users and companies which opt for Green Travel initiatives. One must note that a number of measures to this effect already exist, including tax deductions for businesses opting for EVs and hybrids. One must also stress that in spite of the very detailed statistical analysis of the Maltese transport system, adequate yearly financial estimates are difficult to predict and sustain for 10 years and even more so for 2050 targets. Henceforth our feedback is limited to the assumptions listed in the documents.	Comment noted.
148	Chapter 2 Road Transport Measure 2.2.2.2	Matthew Caruana	26/06/2016	Encourage Companies to introduce flexi time. Instead of the standard 8-5 office hours, companies are encouraged to allow a 2/3 hour flexi time for employees to get to work. For example allow employees to report to work between 7-9 and leave between 4-6. This gives employees to be flexible from one day to another depending on their needs and reduces the stress on the roads during peak hours as the workforce is spread. On the other hand companies have the guarantee that core hours are covered by all employees.	Comment noted. This has been addressed in Measure 2.2.2.2
149	Chapter 2	Justin Zarb	22/07/2016	"Malta has high car dependency rates and low car occupancy rates." This is one of the low hanging fruit in addressing congestion. Organize	Comment noted. This is addressed in Measure 2.2.2.2

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Road Transport Measure 2.2.2.2			carpooling at a national level by working with local app developers, perhaps as a public-private partnership, or work with the ministry for Public Transport to introduce a company such as Uber. The latter has recently introduced a new service called Uber Pool, which as the name suggests, allows customers to share the same ride to their destination, reducing congestion.	
150	Chapter 2 Road Transport Measure 2.2.2.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This is a positive intention. The bullet points in page 78 provide a positive approach. Incentives for businesses to shift towards policies that could have such a positive effect such as incentives for online shopping and e-commerce, support to businesses to be able to provide flexible working arrangements where applicable (since the vast majority of SMEs and micro-enterprises do not have the same economies of scale of the public sector), and other incentives related to transport such as highlighted above are necessary if this aim is to be reached.	Comment noted.
151	Chapter 2 Road Transport Measure 2.2.2.2	Aimee Borda	09/08/2016	There should be more incentives for people to use bikes / motorcycle: (1) If you go with a foldable bike your bus ride is free (2) On buying a bike, the government can subsidize the electric motor (3) There should be a study on the introduction of city bikes like in London, Amsterdam and Dublin, but this goes hand in hand with have centres car-free (4) In public events, there should be advertisement that states if you cycled there you get a free drink (just to create a culture for cycling) + provide locker parking for bikes in such events (5) Bike routes map should be drawn up - contain alternative to popular routes that would be safe enough to cycle. This should serve as a one-stop site to get started with cycle commuting	Comment noted. These proposals have been covered in different measures such as Measure 2.4.2.5 and Measure 2.2.2.4. Measure 2.2.2.2 has also been amended to include "Alternative Modes"
152	Chapter 2 Road Transport	Joe Bezzina	27/06/2016	The government should pass a law forbidding any car driver to be alone in the car from 6am to 9am. This would either force car pooling or else (since car pooling is not the most comfortable of options for independence reasons) one would be forced to buy a motorino. I am	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.2.2.2			assuming that the majority would opt for the second solution since it would guarantee independence. This would reduce many cars from our roads which in most cases are used by one person only. The traffic during the 4pm-7pm rush hours would be abolished as well as in most cases this traffic results from drivers going back home from work.	
153	Chapter 2 Road Transport Measure 2.2.2.2.	Ruben Farrugia	27/06/2016	Other innovative travelling like self-balancing scooters, electric scooters and so on tax free	Comment noted. This has been addressed under Measure 2.2.2.2.
154	Chapter 2 Road Transport Measure 2.2.2.3	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	A concerted approach as suggested is solicited. Funds allocated to any authorities related to infrastructure and its upkeep, such as Local Councils, need to be monitored that these are being used for such purposes. It is also essential to have representatives of transport and logistics operators as well as the business community at large to ensure that their realities and expertise are also around the table. Impact assessment related to transport and infrastructure when projects are being undertaken is also essential.	Comment noted.
155	Chapter 2 Road Transport Measure 2.2.2.3.	George Debono	18/07/2016	I have attended Local Council meetings – sometimes the council means well and has good ideas but they are obstructed by TM or MEPA. Creation of a multi-organisational team to develop a Pedestrian Infrastructure Plan is an excellent idea. It should be subject to the least interference possible and work in close collaboration with councils. Another problem with councils is that they are at the mercy of their community; this places another constraint on councils. Most of the members of the communities (who elected the councillors!) raise objections to measures which inhibit car circulation. Put simply, councils are at the mercy of petrol-heads. Whenever a measure in favour of pedestrians (typically, pedestrianizing a street or a bus lane) there is a	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				chorus of complaints to which the council has to submit.	
156	Chapter 2 Road Transport Measure 2.2.2.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the stance but believes that representatives from the business and local community should also be involved in these task forces.	Comment noted.
157	Chapter 2 Road Transport Measure 2.2.2.3.	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	This is an excellent measure. What is the target for this plan? The 2004 White Paper aimed for half pedestrian infrastructure to be upgraded until 2014.	Comment noted. It is difficult to establish a target at this stage as a national survey of the condition of pedestrian infrastructure would need to be carried out.
158	Chapter 2 Road Transport Measure 2.2.2.4	George Debono	18/07/2016	Agree on the whole – but, again: The guiding principle should be based on the adage “If you make it safe, people will ride”.	Comment noted. Refer to Measure 2.2.2.4 - "identify a cycling route network as well as design principles for the provision of cycle friendly streets" and also Measure 2.2.10.3 - Develop Design Guidelines for Safety Measures with respect to Designing for E-Bicycles, Bicycles & Motorcycles.
159	Chapter 2 Road Transport Measure 2.2.2.4	George Debono	18/07/2016	Re: “still considered by most to be dangerous... within the built up areas..... given the high frequency of junctions, narrow roads, poor provision at junctions and possibility of ‘dooring’ from parked vehicles.....” My opinion is that it is also dangerous on non-urban roads for different reasons (i.e. dangerous everywhere) . Many, if not most, of our serious bicycle-car accidents took place outside built up	Comment noted. This is included in Measure: 2.2.10.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>areas.</p> <p>Lack of Legal protection - Cyclists lack protection on the road. Malta is one of five countries (UK, Cyprus, Malta, Romania, Ireland) which is out of step with the rest of Europe because it does not operate any form of fair liability rule or principle for the protection of vulnerable road users. (see Appendix I)</p> <p>Law enforcers (police, judiciary) have too lenient an attitude to motorists who injure or kill vulnerable road users so that motorists feel relatively immune from serious repercussions if they are responsible</p> <p>The judiciary and police have a bias in favour of motorists and a tendency to blame the victim. Attention was drawn to this in the report "Towards a Low Carbon Society - the Nation's Health, Energy Security and Fossil Fuels" (TPPI, 2008).</p>	
160	Chapter 2 Road Transport Measure 2.2.2.4	George Debono	18/07/2016	<p>In my view the aim should be, as far as possible, to make cycling safe everywhere. In urban contexts it should be the norm for motor vehicles to share the road and to enforce a 30km/hr speed limit. Measures based on the principle of segregation (popular in Malta) or creation of 'safe areas' is liable to reinforce the current undesirable motor-minded mind-set that streets and roads belong solely to motor vehicles . Reasonable exceptions (i.e. "no-go areas") would be some of our heavily-trafficked major dual carriageway roads with fast, especially heavy goods, motor vehicle traffic (our equivalent of motorways) - and tunnels (which are both dangerous and too heavily polluted for cycling). In this case cycle lanes or tracks would be suitable. It tends to rain heavily in Malta. Roads are poorly drained (not to mention prone to flooding). Both pedestrians and (especially) cyclists are exposed to being drenched by cars passing at speed. This argues strongly for cycle tracks on main roads. These will place cyclist slightly further away from passing traffic. Such tracks should have a porous non-skid surface & be well drained. In general heavily travelled roads, especially on daily</p>	Comment noted. Measures 2.2.2.4 and 2.2.10.3 address these issues.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>commuting axes should ideally have a continuous cycle lane or, far preferably, a segregated cycle track . On the other hand it is mostly impossible to create urban cycle lanes, tracks or other bicycle/pedestrian infrastructure because roads are too narrow to permit. These roads and streets should be freely accessible (and safe) for bicycle commuters who would be expected to do mostly short local journeys on shopping and other errands. The bottom line is that the aim is that using a bicycle should be made safe everywhere and this over-rides the importance of provision of a cycling route network or indeed cycle paths and cycle tracks.</p>	
161	<p>Chapter 2</p> <p>Road Transport</p> <p>Measure 2.2.2.4</p>	George Debono	18/07/2016	<p>Money is better spent on better training (and induction of attitude change) for all road users - and driver awareness campaigns. An interesting issue in this context is the “Safety in numbers” Phenomenon. This is also relevant to the issue of undue emphasis of taking bicycles off the road in the urban setting. An increase in the number of cyclists on the roads therefore does not necessarily translate into a corresponding increase in cycling accidents. Reduction in risk of cycling accidents in traffic has been statistically calculated; cycling accidents decrease by 34% for each doubling in cycling volume.</p> <p>Cyclists on roads confer the added bonus of serving as a traffic calming device. The presence of cyclists on the road exerts a positive influence on motorists’ and promotes a more cautious response from road vehicle users towards cyclists. As the number of cyclists on the road continues to increase so the relative accident rate decreases. If uptake of bicycles is to be encouraged fostered it may be worth anticipating that there may be a critical phase with an increase in cycle-vehicle collisions until the number of cyclists on the road reach a critical mass to influence motorist behaviour – until the safety in numbers phenomenon starts to operate.</p>	<p>Comment Noted. This is reflected in Measures 2.2.2.4 and 2.2.10.3.</p>

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
162	Chapter 2 Road Transport Measure 2.2.2.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	<p>Although the Chamber agrees with this measure, unless the right infrastructure is in place and individuals find the right facilities at their place of work, this scheme will never take on. Unfortunately given Malta's geography in having a hilly landscape and hot weather conditions does not make it conducive towards cycling. At the same time, the vast majority of roads do not have the</p> <p>space to include a cycling lanes limiting the use for cyclists of major thorough fares and other roads. All if these will in the short term impinge directly on the proliferation of cycling as a sustainable mode of transport rather than a weekend hobby or sport.</p>	Comment noted. Improving conditions and infrastructure for cycling is the main purpose of the Measure 2.2.2.4. This includes the introduction of dedicated cycle lanes and shared cycle lanes. It should be noted that although there is some correlation between climate and cycling, Malta's climate is conducive for cycling throughout most of the year. Furthermore, some cities in warm climates have very high cycling rates.
163	Chapter 2 Road Transport Measure 2.2.2.4	Bicycle Advocacy Group (BAG)	22/07/2016	<p>The Mgarr infrastructure is on one side, the downhill side with some 66 ramps, where the priority of the 33 drive-in's is not clear, which according to the regulations may (or may not) be used by the cyclist. Such infrastructures are of little practical help to cyclists. In particular, the desire for segregation may work against the cyclist causing and actually generating conflict between other road users who are a) unaware of the inefficient and b) unsafe nature of such infra, while c) creating a bikes-out-of-the-way-of-cars goal orientation which serves car drivers well, but fails to deliver a suitable infrastructural solution to the ultimate end user – cyclists! The important point here is whether infrastructures serve the actual end user. Even the new Coast Road continuously breaks the cyclists on-road trip forcing them onto SPF's significantly twice after descending from Pembroke when cyclists may be hitting 40KPH plus into a bus stop area where passengers may be disembarking. BAG tenders this opinion as a reason why infrastructures do not appear to work as guidance to ways to finding a solution and a</p>	Comment noted. Will be referred to competent directorate within Transport Malta - Roads and Infrastructure Directorate (RID).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				way forward to better understanding and design.	
164	Chapter 2 Road Transport Measure 2.2.2.4	Ruben Farrugia	27/06/2016	Use of motorised bikes more with more bike lanes in all roads	Comment noted. This has been addressed under Measure 2.2.2.4 and will include pedelegs.
165	Chapter 2 Road Transport Measure 2.2.2.4	Bicycle Advocacy Group (BAG)	16/07/2016	At Żurrieq, to get from Misraħ ir-Repubblika near the Parish Church to Triq il-Bronja, one has to cycle this 1km detour: https://goo.gl/maps/55i6uwiLnZz Or this 700m detour: https://goo.gl/maps/7TTdCcs2oAK2 Because one cannot go straight through Triq San Mikiel, just 90m long, which has a bus contraflow, funeral services contraflow, school transport contraflow, but not a bicycle contraflow, where a cyclist takes maybe just 1.5x the space of a pedestrian: https://goo.gl/maps/X...UXF5CsSEJ82 This appears possible in the highway code already (rule 180), see attached excerpt from the MHC that suggests that bicycles may be allowed to use bus contraflows. "One-way streets 180. These are shown by road markings and signs. You MUST travel or park in the direction indicated by signs. Buses and/or cycles may sometimes have a contraflow lane."	Comment Noted. Refer to Measure 2.2.2.4 and the development of design principles for the provision of Cycle Friendly Streets. Measure 2.2.5.1 will also incorporate cycling. Contra flows on low/speed urban roads will be technically assessed as part of Measure 2.2.2.4
166	Chapter 2 Road Transport Measure 2.2.2.4	Bicycle Advocacy Group (BAG)	17/07/2016	At a recent meeting held at the Safi Local Council a suggested bicycle contraflow at the wide road Triq iż-Żurrieq in Safi which already has a bus contraflow, was turned down. This avoids a long detour and does not affect any oncoming traffic. It is also possible under the MHC under rule 180.	Comment Noted. Refer to Measure 2.2.2.4 and the development of design principles for the provision of Cycle Friendly Streets. Measure 2.2.5.1 will also incorporate cycling. Contra flows on low/speed urban roads will be technically assessed as part of Measure 2.2.2.4

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
167	Chapter 2 Road Transport Measure 2.2.2.4	Bicycle Advocacy Group (BAG)	17/07/2016	The experience of BAG is that it is difficult to convince local councils and TM to adopt bicycle friendly infrastructure	Comment noted. The development of a cycling strategy envisages in Measure 2.2.2.4 shall be carried out by multi-organisational team with representation from Local Councils. In addition, new Measure 2.2.5.4 will facilitate working with Local Councils.
168	Chapter 2 Road Transport Measure 2.2.2.4	Motor Insurance Association (MIA)	22/07/2016	Transport Malta has been encouraging motorists to switch to cycling as a healthier option for transport. Many have also decided to switch to using motorcycles as a way to bypass congested traffic. Clearly this has created a different environment to which many motorists are unused and which has resulted in a noticeable increase in the number of cyclist related accidents. MIA therefore supports all initiatives, such as campaigns to increase driver awareness, to educate cyclists on how they can ride safely and the creation of dedicated cycle lanes. The MIA also supports the compulsory wearing of safety helmets for bicycle users.	Comment noted. Measure 2.2.2.4 addresses regulatory issues related to cycle safety, infrastructure, use and equipment.
169	Chapter 2 Road Transport Measure 2.2.2.4	George Debono	18/07/2016	Such a strategy is a dire need. But any such strategy must first address fundamental issues, These include Historic Factors, Perception Factors, Dangers (perceived and real) , Opposition from car lobby, Legal Protection of vulnerable road users, Presumed Liability principle/law, Child safety, Bicycle Contraflows, updating of Traffic code, lifting of Pedelic restrictions and, as argued elsewhere, introduction of 30km/h urban speed limits reinforced by traffic calming.	Comment noted.
170	Chapter 2 Road Transport Measure	Bicycle Advocacy Group (BAG)	22/07/2016	The lack of a National Cycling Policy is significant, current plans to create a National Cycling Strategy (NCS) are cause for concern as this is largely infrastructural devoid of the necessary legal framework. Out of 4 meetings only one has actually taken place and BAG had to provide minutes for this. BAG's own national policy (NCP) proposal	Comment Noted. A National Cycling Strategy will not limit itself to infrastructural proposals. It will also look at the development of design guidelines and a review of regulatory provisions. To

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.2.4			<p>already tabled before TM includes 4 pillars in line with the German model, being;</p> <ul style="list-style-type: none"> • A legal framework embodying both infrastructure and protection measures. • An infrastructural catalogue. • The communication of these standards to stakeholders. • Empowerment for action and dissemination of skillsets and resources. <p>This has not to date been taken up by TM, neither can BAG envision the NCS being successful as a standalone project and this should be encompassed within the Transport Strategy Master Plan in order to be effective.</p>	<p>further emphasise this Measure 2.2.2.4 has been updated to reflect this comment."</p>
171	Chapter 2 Road Transport Measure 2.2.2.4	Bicycle Advocacy Group (BAG)	22/07/2016	<p>The Transport Plan suggests that; 'In the last 10 years or so, a number of dedicated cycle lanes and bus lanes permitting cycle usage have been incorporated into road infrastructure design with the aim of providing a safer, more segregated environment for cyclists in road traffic. In the main part, cycle lane provision has taken place on the wider main roads, outside of built up areas and, as such, are largely used by sports and leisure cyclists, but less so by commuters.' (TMMP, 2016: 78) However, the Master Plans notation on current cycling infrastructure and national network such as it is, is somewhat optimistic. Figure 19 on page 74 shows a number of cycle lanes that are in reality off-carriageway shared pedestrian footpaths (SPF's) either as stand-alone infra or which break more efficient on-road cycle lanes. The design speed of these is unclear, the only reference to this kind of infra is in the Low Powered Vehicle and Pedal Cycle Regulations as being 6KPH (walking speed) giving way to pedestrians at all times. This is a totally unacceptable infrastructure for cyclists and particularly in a rural environment over larger distances and this is why they are not used.</p>	<p>Comment noted. This will be addressed under Measure 2.2.2.4 where the regulatory framework and infrastructural requirements for the design of cycle infrastructure will be reviewed.</p>
172	Chapter 2	Bicycle Advocacy	22/07/2016	<p>As such a good 80% of the infra shown in figure 19 can be discounted as being pedestrian priority footpaths that cyclists may share. An effort to</p>	<p>Comment noted. This has been addressed under Measure 2.2.2.4 and the text has</p>

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Road Transport Measure 2.2.2.4	Group (BAG)		<p>create cycling infra where a travelling speed of 18 to 32KPH can be maintained should be a priority. SPF should be redesigned with EU funding for sustainable transport as a priority if cycling as a practical means of normal transport is to be encouraged both in rural and urban aspect. BAG would tend to point out that judging infrastructures effectiveness by what someone who normally does not ride to work during the week and visits such an infrastructure on a Sunday with the family bikes (i.e. wandering along at a very slow leisurely pace), is not realistic when judging its effectivity as a commuting route in weekly traffic rush-hour period. There tends to be a disconnect from the artistic impression and the real world. Simply put designers need to do it for themselves to understand the issues. Egro BAG supports the following statement but would go further. The Master plan acknowledges that; ‘Cycling in the congested streets within the built up areas is still considered by most to be dangerous, given the high frequency of junctions, narrow roads, poor provision at junctions and possibility of ‘dooring’ from parked vehicles... <i>The measure would include an in depth study to again assess desire lines, connectivity issues between and through urban area and at major infrastructure so as to identify a cycling route network as well as design principles for the provision of cycle friendly streets.</i>’ (TMMP, 2016: 79)</p>	been revised to include the notion of speeds.
173	Road Transport Measure 2.2.2.4	Bicycle Advocacy Group (BAG)	22/07/2016	<p>The mapping and availability of a smart route planner on mobile devices is a huge potential boost, traditional providers such as Google have for years not provided a service for Malta. Importantly these and other measures promise cyclists ‘cycling prioritisation and additional security for cyclists’ (Ibid: 79) that is long overdue. BAG would tend to support this position taken by the master plan, importantly lack of route mapping is a significant area of enquiry from most newcomers. How do I plan my route from A to B, and this can be the most significant contribution to cyclist ‘soft’ infrastructure.</p>	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				Strava can be most useful. Using red well used routes where Safety in Numbers is high needs to be balanced by use of quieter blue routes for instance.	
174	Chapter 2 Road Transport Measures 2.2.2.4; 2.2.2.5; 2.2.2.6	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	All are positive measures to consider but due consideration is to be given to feedback below on point 2.2.2.7	Comment noted.
175	Chapter 2 Road Transport Measure 2.2.2.5	Bicycle Advocacy Group (BAG)	22/07/2016	BAG would strongly support this position taken by the master plan. As stated in the previous pages all local councils should be encouraged to develop low impact cycling corridors, however the targeted routes are a good starting point. Very little is stated about directionality for bicycles as found in other EU states and is worth exploring. Even a simple rule stating that cyclists should stop and give way when using suitably marked one way streets against the flow of traffic may be enough. This places the onus on the cyclist. BAG would tend to point out that the flip side of this is cars being stuck behind cyclists avoiding a double door zone using not just one short bit of a one-way street by large parts of a one narrow one way systems which is normally the case. Alternative methods are to use bollards that prevent streets being used as rat runs but allow easy access for resident from either end or simply to allow cyclists to use resident one ways or resident access streets.	Comment noted. Measure 2.2.2.4 has been revised to include a note that contra flows on slow speed urban street will be technically assessed as part of this measure.
176	Chapter 2 Road Transport Measure	University of Malta - Institute of Climate Change and	16/08/2016	The University has worked hard to include and promote cycling in its Green Travel Plans. The inclusion of the University in the proposed cycling routes would add value to our efforts and support our increasing number of cyclists.	Comment noted. The development of further corridors will consider the University of Malta as a key node on the network.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.2.5	Sustainable Development (ICCSA)		<p>See more at http://www.um.edu.mt/University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)/greentravel</p> <p>Travel planning should also be extended to public and private entities including Local Councils. The latter having an important role in ensuring there is information about all modes of travel within the locality.</p>	
177	Chapter 2 Road Transport Measure 2.2.2.5	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the concept of starting this project as a pilot one on certain routes.	Comment noted.
178	Chapter 2 Road Transport Measure 2.2.2.5	Daniel Cauchi	15/07/2016	<p>Green tourism: TM is laudably involved in exploring potential cycling routes to encourage local green tourism. This is an excellent idea. I recently had the opportunity to participate in the consultation exercise carried out by the Marsaxlokk Local Council regarding the Marsaxlokk Regeneration Plan. I have taken the liberty of copying a section of the feedback below: Coming from Marsaskala, I frequently ride my bicycle via St. Thomas bay and up the Zejtun bypass through the countryside into Marsaxlokk. It's a beautiful ride that I have always thought should be promoted as a tourist cycling route to promote local green tourism (perhaps with suggested stops along sites of historical interest such as Zonqor Battery, St. Thomas Tower, Torri Mamo, Tas-Silg etc). Installing signs to highlight the cycling route would be easy, although perhaps some additional painted cycling lanes along these routes would be required. Additionally, cycling facilities in the town of Marsaxlokk itself are lacking. It should be quite easy to factor in shared cycling lanes (combined pedestrian/cycling areas) to further increase the accessibility of Marsaxlokk.</p>	Comment noted. The introduction of pilot cycle routes in addressed in Measure 2.2.2.5. This will be used as demonstration projects for the potential of rolling out in other localities.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
179	Chapter 2 Road Transport Measure 2.2.2.6	Bicycle Advocacy Group (BAG)	22/07/2016	BAG would tend to support this position taken by the master plan with the following rider. While greatly encouraging the introduction of PBS and EPBS the implications of the mandatory use of helmets on pedelecs within the current regulations has not been grasped by senior staff at TM or the Ministry. Particularly with regards to E-Public Bike Share and the provision to each patron of a clean, hygienic helmet for each trip. This is despite multiple reports stating this. Any in depth study must reflect this. However, any such study should also use the WHO HEAT tool to estimate the financial benefit to the state in balance. Based upon highly conservative estimates this would cost a quarter of a million per annum above any other running costs rising proportionately with trip patronage. The Master Plan acknowledges that PBS is designed largely for non-cyclists so it is unlikely that patrons would have either, bike or helmet. In addition, it is not clear how other regulatory conditions will be met or supervised. Overall the concept is a sound one although it is severely handicapped by current legislation from an EPBS perspective. Normal PBS could also be supported by shower pods at docking stations to overcome the sweat factor. PBS is a great driver of safety in numbers and BAG would not hesitate to endorse it, although we could not do so for EPBS without raising the serious concerns about the financial viability and thus sustainability stated above. BAG tends to support the view that there is a mismatch between a perceived protection level afforded by EC1078 helmets (from cars) and the proven positive benefits of safety-in-numbers which mandatory helmet laws tend to subtract from.	Comment noted. Transport Malta has been exploring the opportunity to use the WHO's HEAT Assessment Tool for both walking and cycling. The issue of helmet requirements will be reviewed under Measure 2.2.2.4 and Measure 2.2.2.6
180	Chapter 2 Road Transport Measure 2.2.2.6	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees that the first instance or pilot project for bike sharing should start with Valletta which is a self-contained city with limited vehicular access. Potential for other pilots could be the three cities, the University Campus, MCAST main campus in Corradino, Industrial Zones, Dingli especially the cliffs zone, other rural zones and	Comment noted. The location for the introduction of further cycling corridors will be studied in detail.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>potentially Gozo as a whole.</p> <p>Should there be the right cycling lanes there could be further potential to extend the system from Valletta all the way to St Julians and beyond but at the moment the Chamber feels that the infrastructure is not conducive to extend such a service beyond contained large and less congested spaces.</p>	
181	Chapter 2 Road Transport Measure 2.2.2.7	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	It is a good idea to develop Sustainable Urban Mobility Plans but for the whole island and not for a locality or two. In doing so the concept of sustainability should be addressed holistically	Comment noted. The Master Plan has adopted a similar approach by proposing one SUMP for Gozo and one SUMP for the main urban conurbation as identified in Fig. 29. This area has been identified based on demographic and transport data analysis as well as urban morphology and future and existing development patterns.
182	Chapter 2 Road Transport Measure 2.2.2.7	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Modal Transport Plan is needed after necessary consideration, studies and consultation. Individual efforts are important but not effective if not undertaken under a holistic view.	Comment noted. The need for an interdisciplinary approach is addressed in Measure 2.2.1.6.
183	Chapter 2 Road Transport Measure 2.2.2.7	Therese Bajada	07/07/2016	SUMPS can be enhanced by the introduction of smarter choices, including travel planning, which could be implemented by public and private entities e.g. within Local Councils. The latter would ensure that the public knows where to ask questions, as well as ensure that there is help available for people who are trying to use alternative modes of transport, but have no idea on how to change modes.	Comment noted. This could be developed as part under Measure 2.2.2.7.
184	Chapter 2	Bicycle	22/07/2016	BAG would tend to support this position taken by the master plan, in	Comment noted. The approach adopted

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Road Transport Measure 2.2.2.7	Advocacy Group (BAG)		addition we would suggest that local councils that fail to publish a SUMP with a particular emphasis on active mobility, within the next 3 years are ineligible for further road and transport funding.	by the Master Plan is to develop a SUMP for the urban region indicated in Fig. 29 as the guidelines for SUMP's indicate that boundaries are to be developed based on functionality rather than administrative ones. Measure 2.2.5.5 has been added to address funding for Local Councils and active mobility will be emphasised in the design guidelines produced under Measure 2.2.5.1 and 2.2.5.3. Such guidelines would need to be adhered to.
185	Chapter 2 Road Transport Measure 2.2.2.7	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure.	Comment noted.
186	Chapter 2 Road Transport Measure 2.2.2.7.	Liz Aquilina Bianco	22/07/2016	<p>My main area of concern is Valletta. Following the restructuring of traffic direction around Valletta owing to the Renzo Piano Project, it can be stated that Valletta has two main entrances, namely St. Paul's Street, and Great Siege Road, and a less popular entrance via Crucifix Hill, more or less stops at Lascaris, and two exits, again Great Siege Road and Lascaris Road.</p> <p>Technically this should mean that traffic should not be encouraged to drive through Valletta, unless it is either to render a service, or for residential use.</p> <p>Efforts should be made to reduce carbon dioxide, and other vehicular traffic emissions, which pose a health risk and are also damaging the general environment and buildings. It has taken decades to clean building facades from pollution grime, let's not have to repeat the process in a few short years.</p>	Comment noted. The further development of the Valletta Sustainable Mobility Plan is addressed in Measure 2.2.2.7.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>Valletta needs circulating electric buses, for cleaner air and improved accessibility from parking areas just outside the city.</p> <p>An underground passage access should be looked into, underground passages, if properly maintained have a multitude of benefits. They are excellent safe pedestrian zones, they are good cover from heat in summer and rain in winter, and they are noise/sound proof. This should make them excellent pathways from parking areas in Floriana, into Valletta.</p>	
187	Chapter 2 Road Transport Objective 2.2.2; Objective 2.2.5	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	<p>There is a shortage of resources (particularly in terms of skills and budgets) at the disposal of Local Councils or other agencies to effect positive transformation to encourage modal shift. Aside from research and investment in technology and hard infrastructure, resources also need to be channelled towards 'soft' measures and infrastructures aimed at understanding or challenging behavioural considerations and implementing pilot projects, and longer term infrastructure to positively influence the choice of walking and cycling modes.</p>	Comment noted. Measure 2.2.5.6 has been added to reflect this.
188	Chapter 2 Road Transport Objective 2.2.2; Objective 2.2.5	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	<p>The document makes reference to the 450m walking distance, generally used as a rule of thumb for comfortable waking distances by average users (but not necessarily for weaker members of society like children and the elderly). It should be noted however, that in bland, hostile environments that are not designed for pedestrian comfort, 450m may not be a comfortable distance to walk, even for the average user. Again this places emphasis on the need to design street environments for walking and cycling.</p>	Noted. Comment noted and document has been revised to reflect this. Paragraph 2 of Objective 2.2.2 acknowledges this.
189	Chapter 2 Road Transport Objective	Bicycle Advocacy Group (BAG)	22/07/2016	<p>Similarly, one of the problems with this is the chicken and egg problem is that many parents see roads as too dangerous for their children on bicycles. Many do not have the skills to teach their children because they never learnt themselves. Research by the BAG would tend to suggest that those pastime and competitive cyclists are better placed to</p>	Comment noted. This is addressed in Measure 2.2.2.4 which aims to produce on the design guidance for cycle friendly streets. Additionally Measure 2.2.5.4, Measure 2.2.5.5 and 2.2.5.6 have been

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.3			teach their own children how to ride and use such bikes by first attracting them to do so. Teaching children to cycle is laudable and vital, but useless if their own parents who do not ride, deter them from using them on the streets due to perceived risk. Equally BAG has never heard of a parent telling their offspring not to buy a car on the basis that it is (in reality) too dangerous. Clearly this would require bicycle friendly streets that allow children to cycle on to and from school.	developed to support Local Councils in achieving this.
190	Chapter 2 Road Transport Objective 2.2.3	Bicycle Advocacy Group (BAG)	22/07/2016	There needs to be an adult carrot to help bicycle use such as a tax incentive to use a bicycle for commuting to work, which could self-finance itself due to lower health care costs.	Comment Measure 2.2.2.2 has been updated to reflect this comment.
191	Chapter 2 Road Transport Objective 2.2.3	Karen M. Zammit Manduca	19/07/2016	Measures aimed at reducing car ownership could include taxing 2nd and subsequent cars owned. The amount would have to be quite substantial to discourage people from having more than one car, and a system would have to be found in the case of those who use a vehicle, such as a van, for work purposes. There are many situations where people have several cars, all parked on the roads, thereby reducing manoeuvrability and usability of roads in urban areas. This will also help reduce on-street parking in residential areas, especially those areas that are becoming densely populated due to overdevelopment.	Comment noted.
192	Chapter 2 Road Transport Objective 2.2.3	Karen M. Zammit Manduca	19/07/2016	Another mitigation measure could be the insistence with those responsible for town planning and building permit approval that blocks of flats should have communal garages, rather than separate lock-up garages, because this situation is reducing on-street parking spaces as well as driving up the price of garages, so much so that many people opt not to buy a garage with their flat, but park their (one or more) cars on the road. In cases where there is not enough turning space to allow only one entrance/exit, if possible (such as in a corner building) plans could	Comment noted. This is addressed under Measure 2.2.1.2 & Measure 2.2.3.1. In addition, this suggestion will be referred to the relevant competent authority - Planning Authority (PA).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				be modified to have an entrance and an exit (i.e. two garage doors instead of five or six). Aesthetically, they will look much better. It should also be insisted that garages are to be kept with the apartment and cannot be sold separately. This would usually mean that a family with two vehicles can park one inside the garage and another in front of it. Should the person not wish to use the garage, or not own a vehicle, then owner should be allowed to rent out the garage to be used for car parking, but at all costs, the garage should remain with the property. This will also go a long way to solving the problem of having many disused garages everywhere (i.e. if they are occupying street space, then they should be used).	
193	Chapter 2 Road Transport Objective 2.2.3	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	Behavioural economics suggests that once people have cars they will continue to use them, unless they are discouraged from using them because this is made impractical or because this is made more costly (taxation, pricing on use). On the other hand, it is clear that in current practice, road use (e.g. for parking) is offered for free at the cost of other road users.	Comment noted.
194	Chapter 2 Road Transport Objective 2.2.3	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The Master Plan does not give due importance to road pricing. Malta was a pioneer alongside an elite group of cities to introduce successfully road pricing in Valletta (CVA). This success is due to a number of factors which are described in an article published at the Institute some years ago. Road pricing is an efficient and effective tool for demand management and the Master Plan needs to make clear what the future of the CVA is and how road pricing will be developed further to manage congestion in the Inner Harbour Region. <i>Attard, M., Ison, S.G., (2010) The Implementation of a Road User Charge – The Case of Valletta, Malta. Journal of Transport Geography. Vol. 18(1) pp 14-22.</i> <i>Ison, S.G., Attard, M. (2013) The Smeed Report and Road Pricing: the case of Valletta, Malta. Bank of Valletta Reviews. Vol. 47(Spring) pp 1-</i>	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>23</p> <p><i>Attard, M., Ison, S.G. (2015) The effects of road user charges in the context of weak parking policies: the case of Malta. Case Studies in Transport Policy. Vol. 3(1) pp 37-43.</i></p>	
195	Chapter 2 Road Transport Objective 2.2.3	Aimee Borda	09/08/2016	Village centres should be car-free (as these should be used for community events) - we should focus on creating more walkable places and not parking.	Comment noted. This has been addressed Objective 2.2.3
196	Chapter 2 Road Transport Objective 2.2.3	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	<p>The last sentence of this section is a very important statement. The Master Plan must also be realistic in terms of the sustainability of large infrastructure projects and the concept of induced demand whereby new road space attracts new drivers and thus shortening considerably the lifespan of expensive infrastructure aimed at alleviating traffic. And this is infrastructure that takes up quite a lot of land, which could be otherwise used for open green spaces.</p> <p>In addition to that, new road construction, in the style proposed for Kappara and Marsa are not hailed as symbols of progress anymore in the western world. Progressive cities show developments in Public Transport and pedestrian areas rather than expensive and land-hungry infrastructure.</p> <p>See more at https://nextcity.org/daily/entry/montreal-tear-down-bonaventure-expressway</p>	Comment noted.
197	Chapter 2 Road	University of Malta -	16/08/2016	The middle paragraph should repeat the conclusion of the 2000 Transport Topic Paper that the minimum parking guidelines had a	Comment noted. Text has been amended, repeating this conclusion.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Objective 2.2.3	Institute of Climate Change and Sustainable Development (ICCSA)		negative impact on parking demand and supply, and overall traffic generation.	
198	Chapter 2 Road Transport Objective 2.2.3	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Push and Pull incentives need to go hand-in-hand. Malta Chamber For Small & Medium Enterprises (GRTU) is more in favour on focusing on Pull incentives since these would reap long-term results other than the more negative Push factors which when not brought into the correct context may have adverse effects on a social and economic level. A shift towards the Pull incentives is expected to happen more efficiently as the public and businesses would see the incentive to do so. Yet for this to happen it has to be clear that the Pull incentives are implemented diligently, making it more natural for commuters to opt for these measures rather than practically forcing them due to Push factors. This would more likely effect changes in routines and old practices to ensure better transport habits.	Comment noted.
199	Chapter 2 Road Transport Objective 2.2.3	Bicycle Advocacy Group (BAG)	22/07/2016	BAG has in the past suggested that rather than increase the fixed cost of car use, circulation tax, in favour of increasing variable costs such as parking and fuel to create a happy medium. So that those who use their car less pay less (TMMP, 2016: 83). The current high cost of circulation tax tends to keep drivers, driving. Having paid their fee, they understandably want their pound of flesh or rather value for money, and tend to use it even if the bus is free. So even higher registration fees are not necessarily conducive to reduced vehicle use. Higher variable costs however are.	Comment noted.
200	Chapter 2 Road Transport	Bicycle Advocacy Group (BAG)	22/07/2016	Importantly we fail to realize that clinging to transit options, is often driven by a desire to retain our own personal car use and that others will use transit. This commonly held mind-set fails to understand that	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.2.3			there needs to be a significant stick backing up the transport carrot, to back up the proposed modal shift. A similar process happened in Stevenage where superb cycling infrastructure built on the grand Dutch style failed to encourage people to cycle because it was just simply still easier to drive everywhere, and that's what people did. In order for mass transit and its heavy investment to work prior to 2025, there needs to be an equal and effective method to disincentivise car use rather than to simply disincentivise car ownership. This should under no account be undervalued or ignored.	
201	Chapter 2 Road Transport Objective 2.2.3	Bicycle Advocacy Group (BAG)	22/07/2016	The master plan admits that addressing traffic congestion by 'increasing the supply and capacity of roads in Malta is neither an effective nor a sustainable solution in the medium term.' (TMMP, 2016: 83) something BAG have suggested for some time. More roads simply mean more cars due to induced demand. BAG would tend to support this position taken by the master plan.	Comment noted.
202	Chapter 2 Road Transport Objective 2.2.3	Bicycle Advocacy Group (BAG)	22/07/2016	While infrastructure bottlenecks at the Kappara junction and Marsa Addolorata junction are planned to take into account the available space, both of these locations to allow junction improvement through grade-separation for predominantly car traffic. Although some consultation has been held regarding the latter, limited to a brief cold viewing of the plans for 15 minutes, an in depth study of both is urgently required to maximise the potential of cycling's modal shift (TMMP, 2016: 84). BAG would tend to support this position taken by the master plan.	Comment noted. The cycle corridors being proposed under measure 2.2.2.5 aims to provide safe alternative cycling infrastructure along these routes to encourage modal shift.
203	Chapter 2 Road Transport Objective	Noel Seguna	22/07/2016	I believe that the Addolorata flyover project will not substantially decrease travel time because once traffic passes through, it is blocked further up the network, if it is able to flow at all. The effect of the traffic lights on the travel time is therefore not a great factor, freeing bottle neck further up the network is. In the current situation, traffic will still not flow even if the upgrade at the Addolorata Junction has	Comment noted. Malta is required at an EU Level to complete its TEN-T Core Network by 2030. Projects such as the Marsa Match Factory Roundabout have been prioritised in the Master Plan as per Measure 2.2.7.1.in order to remove

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.3			<p>hypothetically been made. I think that after building the Kappara Flyover the present situation at the Addolorata Junction will dramatically improve during the morning rush hour.</p> <p>I therefore propose for a flyover or bridge be built between Ras Hanzir in Paola to Triq il-Moll tal-Pont or the surrounding area in Marsa. In practice the authority has already thought of such a solution by allowing access to the public at Dock no.7.</p> <p>So instead of spending money on upgrading a junction which in my opinion is serving its purpose quite well, the money should be allocated to building a new route, thereby probably getting a higher return on investment.</p>	bottlenecks further up the network.
204	Chapter 2 Road Transport Objective 2.2.3 Objective 2.2.4	Ministry for Finance (MFIN)	05/08/2016	<p>One must stress however that opting for fiscal measures as push incentives to encourage modal-shift should be viewed as secondary with priorities being primarily focused on other practical measures (the example of a wider AM peak period through staggering working hours and flexitime/teleworking initiatives). One must point out that along the years, a number of fiscal measures were introduced - including raising the ACT in 2 consecutive budgets - which however did not curb the use of motor vehicles. These measures were then extrapolated further as long-term strategy in the 2050 plan document, where the overall emphasis will be to provide greener modes of transport (0 petrol fuelled vehicles by 2050), encourage modal-shifts in commuting and establish sustainable transport infrastructure planning. These strategic goals go hand in hand with both current measures and short term plans of the Gov.</p>	<p>Comment noted. It is agreed that an integrated package of sustainable transport development measure needs to be introduced. This will reduce the need to travel, encourage more sustainable modes of travel and improve energy and environmental performance of modes of travel.</p>
205	Chapter 2 Road Transport Measure 2.2.3.1	University of Malta - Institute of Climate Change and Sustainable	16/08/2016	<p>Our Lija case study has demonstrated the removal of pavements to fit parked cars and even allow for speed, decreasing dramatically the safety of the road environment. Reference is made to the Strategy Document presented to the Local Council and Lija residents in December 2015.</p>	<p>The Lija study is now referenced and illustrations included as part of Measure 2.2.3.1 as an example of better management of off-street and on-street parking.</p>

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		Development (ICCSD)			
206	Chapter 2 Road Transport Measure 2.2.3.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure but requires further details and clarifications on how the parking management system would operate.	Comment noted. This will be studied in due course and will be discussed in during a consultation process.
207	Chapter 2 Road Transport Measure 2.2.3.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This measure needs to take into consideration the provision of parking facilities and park and ride; alternative means of transport; increased use of Smart Technology and ITS in addition to effective land use planning.	Comment noted. These points have been addressed in Measure 2.2.3.1, Measure 2.2.11.1 and Measure 2.2.1.2.
208	Chapter 2 Road Transport Measure 2.2.3.1	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	Develop the environmental benefits of securing a balance between street / off street parking. Similarly for the removal of on street parking from main distributor roads within village cores and the creation of car parking facilities in strategic locations.	Comment noted. This is among the aims of Measure 2.2.3.1.
209	Chapter 2 Road Transport Measure 2.2.3.1	Bicycle Advocacy Group (BAG)	22/07/2016	'Street space priority in central areas has traditionally been allocated towards the private car, resulting in a general lack of street space available to create safe and attractive infrastructure for cyclists and pedestrians.' (TMMP, 2016: 85) This has conspired to create a top heavy hierarchy where the pedestrian (and their safety) is no longer the greater good, where we tend to design for cars rather than design for people. 'In a society where 40-48% of children and 58% of adults are	Comment noted. Transport Malta has been exploring the opportunity to use the WHO's HEAT Assessment Tool for both walking and cycling.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				overweight and obese, increasing opportunities for active mobility is essential' (TMMP, 2016: 86). BAG would tend to support this position taken by the master plan. Use of the WHO's HEAT tool or similar evaluations should be used to generate suitable tax payer buy in to active transport systems especially cycling.	
210	Chapter 2 Road Transport Measure 2.2.3.1	Environment and Resources Authority (ERA)	26/07/2016	The development of a comprehensive parking management system (pg 85) with the possible addition of off-street parking areas should not be at the detriment of rural land take-up or the take-up of urban green spaces which are necessary in highly urbanised areas. Moreover, the closing-off of some current parking could result in the displacement of parking to another area which could result in streets that were previously not used a lot to them being used more and the pollution problem being solely displaced. This could also result in local access roads becoming so busy that some form of upgrade to these roads would be necessary. The same concerns apply with regards to proposals for new park and rides which would result in the take-up of additional rural land.	Comment noted. Measure 2.2.3.1 will be developed holistically to consider all social, environmental and economic criteria.
211	Chapter 2 Road Transport Measure 2.2.3.1	Gozo Regional Committee (GRC)		Parking in Gozo has now become a real hassle, particularly in Rabat, Marsalforn and Xlendi. The serious lack of parking is keeping away tourists including Maltese and the Restaurants and shops in these areas are suffering the consequences. It is strongly recommended a much better use of existing parking facilities within the school grounds particularly in Victoria so that these areas may become available to the public after school hours, during weekends, public holidays and during the summer months. The plan shall also include policies for the selection and provisions of temporary (seasonal) parking areas particularly in tourism zones such as Marsalforn, Xlendi, Ramla, Dwejra, Mgarr ix-Xini and Dahlet Qorrot to cater for the parking demands in these areas.	Comment noted. Parking management system has already been considered and this will also be applied in both Malta and Gozo. Refer to Measure 2.2.3.1.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
212	Chapter 2 Road Transport Measure 2.2.3.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	A comprehensive parking management system can only work if it is based on a detailed study of (i) understanding current supply (both public and private); (ii) study current demand and use; and (iii) forecast/model future demand. To a certain extent this was applied in the Lija study. <i>Attard, M., Miceli Farrugia, A., Borg Barthet, J. (2016) Sustainable mobility, livability and public space in historic village cores – a case study of Lija, Malta. Paper presented at the International Conference SBE16 Europe and the Mediterranean Towards a Sustainable Built Environment. Valletta, Malta, 16-18 March.</i>	Comment noted. This is standard procedure in which parking studies such as Valletta's CVA have been planned and designed by Transport Malta. This has been addressed in Measure 2.2.3.1.
213	Chapter 2 Road Transport Measure 2.2.3.1	Daniel Cauchi	15/07/2016	Parking fees: Free parking makes driving convenient and affordable. I believe that the introduction of parking meters is necessary in order to make driving less affordable/convenient and increase levels of active travel.	Comment noted.
214	Measure 2.2.3.1 2.2.2.3	Martin Bugeja	02/07/2016	Proposal to provide more public parking spaces, preferably underground and MORE pedestrian areas like those in Sliema and Valletta.	Comment noted. This has been addressed under Measure 2.2.3.1 & Measure 2.2.2.3
215	Chapter 2 Road Transport Measure 2.2.3.1.	OPM Energy and Projects - Projects Malta	16/08/2016	Re references to Carparks, Projects Malta Ltd should soon be launching an RFP for a car park in Mosta and has started analysing possible options for Marsasclara.	Comment noted. New off-street parking provision within the framework of Measure 2.2.3.1.
216	Chapter 2 Road Transport	Matthew Caruana	26/06/2016	Proposal to add more park and ride services to different key areas and introduce congestion charges in areas where park and ride service is offered so that the congestion charge will fund the free park and ride	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.2.3.1			service.	
217	Measure 2.2.3.1	Motor Insurance Association (MIA)	22/07/2016	The availability of parking spaces is at a critical level and there is little doubt that is contributing in no small way to traffic congestion and to the risk of accidents. In many cases on-street parking is being allowed in order to create much needed parking spaces, where banning it would probably create better traffic flows. Many drivers are obliged to drive around looking for scarce parking spaces and sometimes resort to sudden or even illegal manoeuvres to secure a much sought after space. Drivers also engage in illegal parking, in spite of the risk of a fine, as they may end up having no other option. This not only sometimes cause obstructions to traffic flows but also increases the risk of accidents, as pedestrians have to navigate between illegally parked cars and risk being hit by passing vehicles. The MIA therefore fully supports initiatives that create sufficient parking spaces, ideally off-street, and reduce the degree of on-street and illegal parking. The concept of timed parking fees, even for on-street parking in busy areas, needs to be supported as this will allow for the financial viability of the creation of these parking spaces and thus encourage also the setting up of private fee-paying car parks.	Comment noted.
218	Chapter 2 Road Transport Objective 2.2.4	George Debono	18/07/2016	The average urban trip covering distances of only 5.5km could be cited as another good reason for bicycle use for short distances.	Comment noted.
219	Chapter 2 Road Transport	University of Malta - Institute of Climate	16/08/2016	Our study showed that even with considerable investment (financial incentives) the benefits of shifting to electric will be very few in the case of Malta. If we improve the fleet (incentivize fleet replacement to EURO6) and reduce car use, we are more successful at reducing the	Comment noted. However, this should be viewed within the context of other demand-management and sustainable mobility objectives such as Objective 2.2.2

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.2.4	Change and Sustainable Development (ICCSA)		<p>overall external costs as cars, whether electric or running on conventional fuels will still cause congestion (the highest cost in our system).</p> <p><i>Attard, M., Von Brockdorff, P., Bezzina, F. (2015) The External Costs of Passenger and Commercial Vehicle Use in Malta. University of Malta - European Commission</i></p> <p><u>In regards to 2.2.4.3</u> See report for further comments on this measure.</p>	and Objective 2.2.3
220	Chapter 2 Road Transport Objective 2.2.4	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	There is nothing mentioned regarding the Air Quality Plan and the obligations stemming from the NEC Directive.	The 2010 Air Quality Plan has now reached the end of its practical lifespan. A new Air Quality Plan is currently being drafted in fulfilment of obligations stemming from the NEC Directive in which Transport Malta has been collaborating with other entities. The TMP has taken into consideration the provisions of the new draft Air Quality Plan.
221	Chapter 2 Road Transport Objective 2.2.4	Martin Bugeja	02/07/2016	Scheme re motorbike license to encourage uptake was positive. More innovative schemes are required to promote uptake of Electric cars and overcome their expense.	Comment noted. This has been addressed under Objective 2.2.4 and corresponding measures.
222	Chapter 2 Road Transport Objective	Bicycle Advocacy Group (BAG)	22/07/2016	There is sufficient scientific data to suggest that cyclists by being offered alternative less polluted routes and reduced time exposure suffer less in road/traffic bourn pollutants and that the greater longevity of cyclists from between 2.2-5.3 years of set its effects. However, BAG feels that there should be a concerted drive to address high polluters, such as	Comment noted. Minor amendments have been made to Measure 2.2.6.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.4			commercial vehicles.	
223	Chapter 2 Road Transport Objective 2.2.4	Matthew Caruana	26/06/2016	Promote the use of electric cars. I believe Malta can be 100% electric cars. This can be done through measures such as: Electric cars do not pay any congestion charges (when introduced); More charging points and free solar powered charging points; Electric cars can use the bus lanes; Electric cars are exempt from timed parking limitations.	Comment noted. This has been addressed in Objective 2.2.4
224	Chapter 2 Road Transport Measure 2.2.4.1	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	Reference to the Air Quality Plan needs to be included	The 2010 Air Quality Plan has now reached the end of its practical lifespan. A new Air Quality Plan is currently being drafted in fulfilment of obligations stemming from the NEC Directive in which Transport Malta has been collaborating with other entities. The TMP has taken into consideration the provisions of the new draft Air Quality Plan.
225	Chapter 2 Road Transport Measure 2.2.4.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber feels that before moving towards such a pilot project alternatives are offered to High polluting vehicles in accessing such roads. It is our point of view that the study could take into consideration that such vehicles like trucks, vans and trailers would be able to access St Anne Street during certain hours of the day without being tasked to pay an extra fee for the usage of these road/s. Valletta as a main commercial and touristic centre on the Islands will still be required to be serviced by suppliers who own vehicles that tend to pollute more than normal cars but this should not act as a disincentive for business operators to open such undertakings in the capital city. The Chamber	Comment noted. The purpose of Measure 2.2.3.1 is to investigate the feasibility of Low-Emission Zones, assessing all social, environmental and economic factors including those which may not be obvious. This Measure will also consider the rerouting of HGVs.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				believes that limiting access during certain hours in the Capital city is already acting as a deterrent for these type of vehicles to make use of this road.	
226	Chapter 2 Road Transport Measure 2.2.4.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This may result in a negative effect and not be implemented in practice. In order to achieve this goal it would be best to instead incentivise further the purchase of low-emission vehicles in order to change Malta's fleet into lower emission vehicles rather than simply restricting entry to a population which is equipped with vehicles which are not lower emission vehicles. It would result in public opting to go to other zones effecting business or operation in such area negatively and not be a strong enough reason to shift towards lower emission vehicles if this measure is implemented with Malta's current fleet.	Comment noted. Fiscal measures and incentives to favour the purchase and use of clean-fuel vehicles is addressed in Measure 2.2.4.3.
227	Chapter 2 Road Transport Measure 2.2.4.1; Objective 2.2.5	Bicycle Advocacy Group (BAG)	22/07/2016	'...to identify all the areas where air pollution from motor vehicles is regularly at a dangerous level, to assess the different scenarios and options for the access control of high polluting vehicles and to analyse the potential impacts of LEZ introduction on other parts of the road network using network and air pollution modelling software.' (TMMP, 2016: 92) BAG would further suggest the implementation of pedestrian friendly shared space zones for one block around every school that could also incorporate a low emissions zone. BAG would tend to support this position taken by the master plan.	Comment noted, Measure 2.2.5.4 has been added to address this.
228	Chapter 2 Road Transport Measure 2.2.4.1.	Motor Insurance Association (MIA)	22/07/2016	MIA supports initiatives that fiscally penalise the owners of vehicles that are unsuited for Maltese roads due their power, speed and/or weight. These can be in the form of registration tax, road licence fees or "pay per use" fees.	Comment noted. This has been partially addressed in Measure 2.2.4.1.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
229	Chapter 2 Road Transport Measure 2.2.4.2	Motor Insurance Association (MIA)	22/07/2016	MIA supports initiatives that encourage the replacement of aging vehicles (pre Euro 3 rated) through fiscal measures with newer, safer and more environmentally friendly vehicles. These can take the form of scrappage schemes that provide financial compensation to the owner.	Comment noted. This has been addressed in Measure 2.2.4.2
230	Chapter 2 Road Transport Measure 2.2.4.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the alternate scrappage scheme but this should remain purely on a voluntary basis. The measure to update commercial fleets and road based equipment is a good way to reduce emissions and the age of such fleets but the Chamber believes that the private sector should be assisted to do so either through tax credits, direct grants coupled with the reduction in road license fees depending on whether their engines are euro5 or 6 compliant. In the case where owners decide to buy cleaner fuel powered engines such as LPG, bio-diesel or in the future electric vehicles, these should be given further incentives and potentially no road licensing fees should be paid.	Comment noted.
231	Chapter 2 Road Transport Measure 2.2.4.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Recent reviews in second-hand car registration tax have driven this sector negatively in terms of affordability to purchase second-hand cars which was a very active sector in car sales. Whilst acknowledging the need to reduce new car registrations this review has negatively impacted this business sector. This has been done in order to reduce the average of vehicles in a bid to improve roadworthiness but most of all the country's emission scores. It is evident however that there is a specific significant cohort of society that will not be able to purchase new vehicles to replace their respective old vehicle. The system ends to be adapted in a way that allows beneficial purchase of second-hand car vehicles to cater for this target group which would otherwise not be	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				financially able to replace their car. This would result in old vehicles being replaced but second-hand imports that are far more efficient, younger age, and more roadworthy. More information and feedback can be given upon request by Malta Chamber For Small & Medium Enterprises (GRTU)'s respective business sector representatives.	
232	Chapter 2 Road Transport Measure 2.2.4.2	Ministry for Finance (MFIN)	05/08/2016	Other fiscal measures which were introduced in a number of past budgets to focus on the polluter-pays principle appear to be one-off solutions rather than part of a strategic solution. For example, whilst government is embarking on scrappage schemes to get rid of old and polluting vehicles, at the same time the registration tax for vintage vehicles has been reduced drastically. This has brought about a higher average age and reduced the potential for lowering emission levels. This shows an inconsistent and contradictory approach.	Comment noted.
233	Chapter 2 Road Transport Measure 2.2.4.2 2.2.4.3	Walter Barbara	04/07/2016	Proposal to review license fees which are too high and consider monthly payments as opposed to yearly. An example is given where a vehicle older than 30 years with high CO2 emissions is required to pay €8 while other cars with less CO2 emissions pay €500, €600 or more.	Comment noted. This addressed under Measure 2.2.4.2 & 2.2.4.3.
234	Chapter 2 Road Transport Measure 2.2.4.3 2.2.4.4 2.2.4.5 2.2.4.6	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Positive in general as this would make low emission vehicles more effective. It may be considered to focus mostly on the options which are more likely to be taken up by the public as having a few increases of possible re-fuelling of the various options rather than having wider access to one or two options would still make re-fuelling not as accessible. This should be done in consultation with the private operators in the field and also by allocating incentives for existing fuel stations to invest.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
235	Chapter 2 Road Transport Measure 2.2.4.3.	Ministry for Finance (MFIN)	05/08/2016	Regarding EVs and hybrids, these are already benefitting from substantial grants (sometimes equal to the amount of registration tax due on such vehicles), even for business purposes. However given that their price is still relatively higher when compared to conventional vehicles, the shift to such vehicles is slow. The foregone revenue for government from such vehicles' registration tax is already being borne by the government and there is little scope of increasing grants, unless government opts to subsidise such vehicles which could however have state aid implications.	Comment noted.
236	Chapter 2 Road Transport Measure 2.2.4.3.	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	16/08/2016	<p>In Section 2.2.4.3 discusses the introduction of <i>"...further fiscal measures and incentives to favour the purchase and use of clean fuel vehicles"</i></p> <p>One of the main points states that <i>'On this basis, Government should establish an annual target number of clean and zero emission vehicles expected to be introduced in Malta, and adjust annual subsidies to achieve these annual targets in line with the aim to achieve 5,000 of these vehicles in Malta by 2020.'</i></p> <p>We suggest the following insertion: <i>'Malta is committed to increase its efforts to decarbonize its transport sector and move towards cleaner alternative fuels. In line with the EU 2050 Transport Strategy Malta is establishing indicative targets which it will strive to achieve subject to market developments, advances in technology and local specificities. In particular Malta's aspiration to align itself to the EU Commission objective of shifting 50% of the urban transport away from conventionally fuelled cars by 2030 will largely depend on international development in this sector.'</i></p>	Comment noted. This paragraph has been included in the revised text.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
237	Chapter 2 Road Transport Measure 2.2.4.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	Refer to comments above on Measure 2.2.4.2.	Comment noted.
238	Chapter 2 Road Transport Measure 2.2.4.3	Franz Zammit Haber	25/07/2016	Positive feedback that the strategy will alleviate the traffic problem. Also, no more new vehicle registration numbers should be issued. If one wants to buy a new or second vehicle from abroad he has to "buy" an old registration number - i.e. - an old vehicle and scrap it. This strategy will also promote the use of new vehicles and eliminates those which pollute. Financial incentives to promote this idea should be introduced.	Comment noted.
239	Chapter 2 Road Transport Measure 2.2.4.3	Motor Insurance Association (MIA)	22/07/2016	Due to the decreasing market value of vehicles with time, insurers are increasingly having to declare older vehicles, which suffer relatively minor damage in an accident, as "constructive total losses", i.e. not financially viable to repair. Many of these vehicles are not scrapped as insurers are incentivised to sell on the damaged vehicle to other parties, or allow the insured to retain it, in return for some salvage value. Many of these vehicles end up still being repaired, often with the utilisation of incorrect repair methods and the use of low quality replacement parts, which may render the vehicle unsafe for road use. If insurers were to insist that these vehicles are scrapped there would be an economic cost which could ultimately cause motor insurance premiums to rise. The MIA therefore believes that together with Transport Malta it could work on developing a system through which both insurers and vehicle owner are incentivised to scrap such vehicles. Such a system would seek to exploit the value of parts and materials that can be extracted from the damaged vehicle and then	Comment noted. This proposal will be discussed within Transport Malta

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				recycled. This would also create a greater supply of re-usable second-hand parts which will help bring down the cost of repairs generally. It would also help decrease the number of older vehicles from our roads. In addition, the MIA feels that stricter controls need to be applied on vehicles that are still repaired after being declared as “constructive total losses”, before these are allowed back on the road. One possible restriction could be to force the “garaging” of these vehicles and allow the registration plates to be released only after the vehicle has been inspected and found to have been repaired without compromising its safety.	
240	Chapter 2 Road Transport Measure 2.2.4.4	Motor Insurance Association (MIA)	22/07/2016	MIA supports initiatives that encourage the greater use of electric-powered vehicles, which tend to be slower and thus generally safer	Comment noted. The promotion of electromobility is addressed in Measure 2.2.4.4
241	Chapter 2 Road Transport Measure 2.2.4.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber has already submitted its recommendations in this regard in 2013. The Chamber feels that e-vehicles have a lot of potential on the islands and given the investment that was made on installing over or close to 70 charging points around the Island, it is felt that there’s potential for it to grow at a larger scale. Nevertheless, the current incentives and subsidies are deemed insufficient given the initial capital outlay that has to be spent on such vehicles. The Chamber therefore suggest to increase the subsidies to close to 50% of the value of the car capped at 12,000 euros per vehicle depending on which is highest. At the same time although charging points were placed on the Island most of the parking spots linked to the points are usually taken by other vehicles which limit the potential. Therefore, any new measures need to	Comment noted. Measure 2.2.4.4 will consider appropriate fiscal incentives necessary for the reaching of electromobility targets.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				be coupled with enforcement.	
242	Chapter 2 Road Transport Measure 2.2.4.5	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)		<p>Section 2.2.4.5: <i>"IF FEASIBLE, IMPLEMENT LNG REFUELLING STATIONS FOR LAND TRANSPORT BY 2025 ALONG THE TEN-T CORE NETWORK"</i>, includes a measure that <i>'shall involve the carrying out of a feasibility study for the deployment of LNG infrastructure to determine current and future demand in Malta for LNG fuelling facilities, associated costs and calculation of economic, financial and environmental benefits that would result from this investment.'</i></p> <p>It is to be noted that the study carried out by SGS consultants and the future detailed study being prepared for the CEF Synergy Call will not address LNG or CNG refuelling stations for land transport but only LNG maritime bunkering.</p>	Comment noted. It should be noted that Measure 2.2.4.5 emanates from the requirement stipulated in the EU Clean Fuels Infrastructure Directive.
243	Chapter 2 Road Transport Measure 2.2.4.5	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	<i>The Chamber agrees with this stance, it feels that both LNG and LPG are completely underutilised and if promoted well with the right infrastructure could be more cost effective than other conventional fuels and lead to lower emissions form vehicles in general.</i>	Comment noted.
244	Chapter 2 Road Transport Measure 2.2.4.6.	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)		<p>Section 2.2.4.6 <i>"IMPLEMENT CNG REFUELLING STATIONS FOR LAND TRANSPORT BY 2025 ALONG THE TEN-T CORE"</i>, contains a measure which <i>"shall involve the carrying out of analysis of current and future vehicle demand for CNG in Malta and the identification of the potential locations of publically available CNG supply infrastructure along the TEN-T core."</i></p> <p>Same comment to previous point applies here as our studies will focus</p>	Comment noted. It should be noted that the Measure 2.2.4.6 emanates from a requirement stipulated in the EU Clean Fuels Infrastructure Directive.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				on LNG bunkering.	
245	Chapter 2 Road Transport Measure 2.2.4.6	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	CNG like any other natural gas remains a better alternative than petrol and diesel from a cost point of view and impact on the atmosphere. Nevertheless, the Chamber believes that the authorities should focus their policy direction towards electric vehicles and treat natural gas as a secondary option.	Comment noted.
246	Chapter 2 Road Transport Objective 2.2.5	George Debono	18/07/2016	<p>Fewer parked vehicles would be a bonus, but with a vehicle density approaching 2,500 vehicles per square mile there is little that can be done, particularly in residential areas where it is reasonable for people to be able to park near home. What is more intrusive than parked cars is the sheer ugliness of (residential) streets combined with the segregation between vehicle ‘traffic space’ and (ever diminishing) ‘people space’.</p> <p>The emphasis ought to be on improving the street environment and “giving streets back to people”.</p> <p>Shared spaces can succeed in Malta – a narrow heavily used street in Sliema (near Tower Supermarket and adjoining underground car park) has become a typical shared space with cars and pedestrians sharing the same space with no conflict. Even replacement of the tarmac surface with paving stones induces slower speeds.</p>	Noted. Measure 2.2.5.1 will address this issue by developing guidelines for urban streets and Measure 2.2.5.3 has been added to emphasise the importance and potential for shared space / home zones where appropriate.
247	Chapter 2 Road Transport	Karen M. Zammit Manduca	19/07/2016	Scrappage schemes should be structured in such a way that the purchase of a smaller car should be rewarded by a larger subsidy, although the car may cost less, whereas the purchase of a larger vehicle should attract a substantially lower amount. The recent years have seen	Comment noted. This will be referred to the competent authority - Ministry for Finance (MFIN).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.2.5			a surge in larger SUV-type cars on our roads, many being driven by older people (i.e. those less likely to need them for young families and all the ensuing paraphernalia). A measure such as this will serve to encourage the use of smaller, city-type cars, unless absolutely necessary.	
248	Chapter 2 Road Transport Objective 2.2.5	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	There is a reference that trees are important for landscaping and they are a source of increasing our sink to absorb CO2. This should be complemented by initiatives to promote urban greening	Comment noted. Urban Greening will be covered under the design guidance to be produced in Measure 2.2.5.1. Measure 2.2.1.6. is also intended to ensure that objectives such as Urban greening are also considered when developing infrastructure projects by interdisciplinary teams.
249	Chapter 2 Road Transport Objective 2.2.5	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	There is no reference to Actions included in the Noise Action Plan which related to noise from transport.	Comment noted. The programme of works indicated in the Noise Action Plan would not appear to have been implemented. Measure 2.2.5.2 is aimed to address the main issues arising in the Noise Action Plan.
250	Chapter 2 Road Transport Objective 2.2.5	Bicycle Advocacy Group (BAG)	22/07/2016	BAG would tend to support this position taken by the master plan. We would suggest that this also significantly impinges on the bike ability of neighbourhoods also. Importantly cars parked right up to the corner endangers cyclists by restricting the available sightline requiring them to 'take the lane' far more than necessary. Build outs that extend the kerb line and stop/give way line would create a better and safer sightline for drivers. Without the loss of parking.	Comment noted.
251	Chapter 2 Road	Aimee Borda	09/08/2016	... more trees - not only they clean up the air and pollution, they provide the needed shade to cycle in summer and brighten up a road making it more walkable.	Comment noted. Feedback in line with Measure 2.2.5.1 and Measure 2.2.2.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Measure 2.2.5.1				
252	Chapter 2 Road Transport Measure 2.2.5.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with establishment of design guidelines for urban street infrastructure. Nevertheless, it disagrees that national speeds in these areas should be reduced further as in many instances the speeds in most urban cores are between 30 to 50 kms per hour. The Chamber believes that rather than reducing the speed further, enforcement should be increased to reduce illegalities.	Comment noted. The speed of vehicles passing through residential roads in urban cores often acts as a deterrent to active mobility (walking and cycling).
253	Chapter 2 Road Transport Measure 2.2.5.1	Bicycle Advocacy Group (BAG)	22/07/2016	The Bicycling Advocacy Group both acknowledge and encourage the master plans policy that recognises that 'In the past years, very little attempt has been made to redress the growing imbalance in the allocation of street space between provision for motor vehicles and the space needed to create a pleasant living environment for walking, cycling and landscaping. This measure therefore involves the development of design guidelines for urban streets to reduce vehicle speeds, create balanced space allocation, reduce the visual impact of vehicles, and for the appropriate use of trees and landscaping to enhance urban environments' (TMMP, 2016: 97). BAG would tend to support this position taken by the master plan.	Comment noted.
254	Chapter 2 Road Transport Measure	Kamra Tal-Periti (Chamber of Architects & Civil	22/07/2016	As the documents clearly point out, the car dominates most urban environments spatially, acoustically, and in terms of air quality. Most urban environments are 'designed' only for the car. This excludes weaker members of society such as the elderly and children, with an effect on societal health issues such as aging in the community, child	Comment noted. Measure 2.2.5.1 and 2.3.1.1. are aimed at addressing these issues.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.5.1 2.3.1.1	Engineers)		independence and obesity. A more sustainable living environment can only come about if space for the car is reduced and space for other road users is designed into our living environments. This includes: - Prioritisation of bus transit, if necessary at the cost of private car users, to ensure reliability and efficiency of the Public Transport service; - Prioritisation of space for cycling and walking at the cost of parking and, where applicable, car passage.	
255	Chapter 2 Road Transport Measure 2.2.5.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This may result in immediate lack of accessibility for a wide range of cars given our current car population. Refer to previous feedback regarding Low-Emission Zones.	Comment noted.
256	Chapter 2 Road Transport Measure 2.2.5.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with noise mitigation in certain urban areas but one should not only limit noise abatement to transport as there are many other causes that create such pollution including traditional activities such as Village feasts and entertainment activities in Hotels and Lidos in Tourism zones during the summer months. Construction works are another area which require more enforcement when it comes to all forms of pollution. Therefore, it is the Chamber's form opinion that any noise abatement measures should not single out transport from any other activity but should include an overarching measure to abate noise in general.	Comment noted. Many noise mitigation measures are specific to the transport sector (noise barriers, noise reduction asphalt, and careful selection of roadside vegetation) and generally lead to a more pleasant environment.
257	Chapter 2 Road Transport	Karen M. Zammit Manduca	19/07/2016	Vehicle modification that includes noisy exhaust systems must not be allowed if a vehicle is to be driven on roads and for normal use. Likewise, the use of noisy motor bikes must also be discouraged. In the case of motor bikes, perhaps those that generate noise above a certain	Comment noted. All such modifications to vehicles are required to be certified and approved by Transport Malta. Enforcement issues have been addressed

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.2.5.2			level could be made to pay a much higher road tax, whereas cars found using such systems should be fined heftily. The same must be said for those using sound systems at levels that are too loud. There is a law in place that addresses this, but I still have to hear of a single person being fined because the level of music playing in the car was too loud.	through Objective 2.2.12 and respective Measures.
258	Chapter 2 Road Transport Measure 2.2.5.2	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	It is being stated that children suffer the most when exposed to high noise levels of traffic. Is this statement based on any local scientific studies? Has the noise action plan being taken into account? If it is know that children suffer the most from transport, are there any measures in place to reduce this impact on human health? Will the proposed measures be backed up by financial assistance? The Ministry will be setting up a Noise Control Commission and therefore any outcomes and decisions taken by the board can be implemented at a later stage, and therefore we recommend the inclusion of the Noise Control Commission as a measure to assess these issues on a case by case basis.	This statement is backed by research carried out by international institutions such as the WHO. However, Measure 2.2.5.2 has been updated to reflect future collaboration between Transport Malta and Ministry for Sustainable Development, the Environment and Climate change (MSDEC).
259	Chapter 2 Road Transport Objective 2.2.6	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This point needs an effective overall plan designed hand-in-hand with the operators in the sector and their representatives to see to their realities and how matters can be improved. Given Malta's infrastructure and specificities one cannot expect to copy and paste measures that work overseas. This sector has its own limitations given the context of our narrow road infrastructure and effectively no existence of highways, etc. Whilst recognising the need to reduce the negative impact of such vehicles this has to be done within the view of a plan which brings stakeholders together.	Comment noted. The measures within this objective will be developed in consultation with key stakeholders and local councils.
260	Chapter 2 Road Transport	Bicycle Advocacy Group (BAG)	22/07/2016	Although HGV's for cyclists seem to be less of a problem in Malta as opposed to say London, large vehicles do worry people on bikes because of their intimidation factor, also it is not yet clear if new infrastructure such as crash barriers and pedestrian railings on bends	This will be addressed under Measure 2.2.10.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.2.6			and corners will create the same fatality trends with regards to HGV's as in other countries, but it seems highly likely (TMMP, 2016: 98). BAG would suggest further research and monitoring both HGV and cyclist behaviours.	
261	Chapter 2 Road Transport Objective 2.2.6	Ministry for Finance (MFIN)	05/08/2016	Related to the TEN-T network projects is the introduction of a infrastructural and logistics setup to provide better use of ICT applications and parking amenities for commercial vehicles with a view to free-up parking spaces in residential areas. Whilst one must admit that this is a positive development, in the absence of financial data, one cannot comment any further on the costs and viability of such a proposal.	Comment noted. The provision of safe overnight parking for Heavy Vehicles is included in the Marsa Addolorata Junction project which will be funded under the Connecting Europe facility. Feasibility and cost-benefit-analysis studies will be carried out in relation to the Action Plan for Urban Logistics as part of the project pipeline.
262	Chapter 2 Road Transport Measure 2.2.6.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber enquires whether this type of proposal is aimed at increasing fees for registering or renewing road licensing fees for HGVs or possibly banning the importation altogether? If this is the case our organisation believes that instead of such measures the authorities should introduce initiatives for the private sector to modernise their commercial fleets and possibly reducing the size of their logistics vehicles.	Comment noted. This measure relates to the rerouting of HGVs to reduce damage to infrastructure and increase road safety. The enquiries raised here will be taken into consideration when the review of the policy framework is carried out as per the objective of this measure.
263	Chapter 2 Road Transport Measure 2.2.6.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	This is a positive proposal. Consideration has to be made in terms of any direct or indirect costs this would pose to such operators.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
264	Chapter 2 Road Transport Measure 2.2.6.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber requires further clarification on what is meant with this measure? Will goods carrying vehicles required to park in this facility only or will they be able to park them elsewhere?	Comment noted. This facility is being provided as a priority action indicated in the Directive 2010/40/EU on the Deployment of Intelligent Transport Systems and Malta's ITS Action Plan 2013-2017. It is mainly intended for safe, overnight parking non-Maltese registered goods carrying vehicles involved in international transportation.
265	Chapter 2 Road Transport Measure 2.2.6.3	Bicycle Advocacy Group (BAG)	22/07/2016	In addition BAG feel quite strongly that other technologies like cargo bikes and e-cargo bikes deserve closer scrutiny, particularly in the last-mile scenario (TMMP, 2016: 99).	Comment noted. Measure 2.2.6.3. has been updated to reflect this.
266	Chapter 2 Road Transport Measure 2.2.6.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber wishes to be directly involved in the drafting of this action plan.	Comment noted.
267	Chapter 2 Road Transport Objective 2.2.7.	Matthew Caruana	26/06/2016	Where possible improve slip roads and junctions to avoid bottle necks, perhaps carry out a study to investigate whether at key times, the use of roundabouts are restricted in only two directions. Similar to how the Kappara roundabout was for a while. This will help the flow in busy roads such as the road from Zabbar to Fgura as drivers won't need to stop everything to allow drivers cross roundabouts.	Comment noted. This has been addressed in Objective 2.2.7.1 and 2.2.11.2.
268	Chapter 2 Road	Ruben Farrugia	27/06/2016	Dual level of streets i.e. elevated roads expensive but dual traffic	Grade-separated roads are considered along the strategic network where vehicle

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Measure 2.2.7.1				flow is given priority. Also refer to Measure 2.2.7.1
269	Chapter 2 Road Transport Measure 2.2.7.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Ten-T Core and Comprehensive Road Network improvements are overall welcomed and would make drastic improvements to the existing traffic flow in the context of our existing and growing vehicular population and traffic activity. Specific impact assessment has to be undertaken in relation to those being affected by the changes and project and mitigation or compensation measures have to be considered. Project management and duration needs to be effective and with all considerations taken to limit duration and negative impact.	Comment noted. Better planning of road works for major projects is addressed in Measure 2.2.11.3 and Measure 2.2.11.4.
270	Chapter 2 Road Transport Measure 2.2.7.1.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed projects, nevertheless it also feels that the Msida junction should also be included within the scope of short to medium term projects as it is one of the main bottlenecks experienced by drivers	The Msida junction is not defined as being part of the TEN-T Network. All outstanding sections of the TEN-T Core and Comprehensive Network have been assessed utilising a multi-criteria analysis that takes into account numerous economic, social and environmental indicators. The results of this analysis and the priority of completion of the different sections are explained in more detail in Chapter 3.
271	Chapter 2 Road Transport Measure 2.2.7.1	Gozo Regional Committee (GRC)	05/08/2016	A ring road around Victoria is a must in order to alleviate the traffic, clogging and congestion in the Capital Centre especially during rush hours. Investment in the road network in Gozo has to be continued. Along the years efforts to solve the traffic problem that is created in Victoria have been left on paper and it is high time the identified roads in the Gozo & Comino Local Plan (2006) are implemented. Three such roads that can facilitate traffic around Victoria and reduce traffic from	Comment noted. Studying of Victoria Bypass is addressed in Measure 2.2.7.1 Project 19.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>the Victoria centre are the opening of the following roads:</p> <ol style="list-style-type: none"> 1. Triq Viani to Triq il-Belliegħa – Thereby eliminating traffic directed from the east of Gozo to Marsalform from the center of Victoria. 2. Triq Ta' Wara is-Sur to Triq Forn il-Gir – Thereby facilitating further the traffic flow from the East to the West without going through the center of Victoria. 3. Triq l-Imgarr to Triq il-Pitkalija to Triq Ghajn Qatet – To further facilitate access to Xlendi, Munxar, Sannat and Victoria west. 	
272	Chapter 2 Road Transport Measure 2.2.7.1	Environment and Resources Authority (ERA)	26/07/2016	<p>The environmental concerns raised above also apply to proposals involving site interventions and engineering works on the TEN-T network and other road infrastructure. The potential environmental impacts of such proposals should be assessed holistically and collectively from a strategic perspective as opposed to a piecemeal manner. Strategically, it is important to ensure that the transport proposals, and any other unforeseen transport-related infrastructural works/upgrades, should not result in the opening up of relatively pristine areas, natural coasts and remote rural locations to traffic related disturbance and massive road development-related impacts in these areas. Remote rural areas should not be subjected to future development pressures as a result of increased accessibility to these areas. Moreover, additional environmental impacts in sites characterized by pristine natural landscapes, important environmental features and natural habitats, unfavourable topography, geology, etc. vis-a-vis high impact engineering and site interventions are considered unacceptable in principle and therefore should be avoided in the first</p>	<p>Comment noted. A Strategic Environmental Assessment is being carried out on the NTS and the TMP.</p>

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				instance. Some roads which are earmarked for potential upgrading works in the draft Master Plan and pass from such sensitive environments include Marsalforn Road (no. 20) which is located within the Marsalforn valley and is abutting directly its watercourse, the Ghadira/Mellieha' (no. 21) and Xemxija bypass (no.22), amongst others.	
273	Chapter 2 Road Transport Measure 2.2.7.1	Environment and Resources Authority (ERA)	26/07/2016	Other roads which are also earmarked for further upgrading works pass from relatively less sensitive areas. Strategically, the main environmental issues associated with these proposals are likely to focus on the consequences of any shifted traffic pressures and the potential cumulative and holistic impacts of such works in terms of further take up of undeveloped rural land, impacts on the rural character, further formalisation of rural areas and further potential deterioration of the overall natural state of the affected areas. The potential cumulative environmental impacts of such proposals also need to be studied further in plan-level environmental assessments. Some examples of such proposals include 'Triq tal-Barrani' (nos. 14, 15, 16); Notary Zarb Street and Mdina Road (no. 12); Victoria to ferry port (Gozo) (no. 18); Ghaxaq Bypass (no. 28); Burmarrad (no. 23); amongst others.	Comment noted.
274	Chapter 2 Road Transport Measure 2.2.7.1	Environment and Resources Authority (ERA)	26/07/2016	The details of the options and alternatives that are being considered for the 'Malta-Gozo Fixed Link' (no. 10) are still unclear. Noting the sensitivity of the rural, coastal and marine areas which are likely to be affected by any proposed link which involves development or engineering works, such as tunnelling or construction of a bridge including their entry and exit points, foundations and ancillary interventions, Environment and Resources Authority (ERA) will provide further comments once more detailed information is available at this stage before the approval of any related policy. In fact, Environment and Resources Authority (ERA) considers that such proposals, the alternatives and their environmental impacts need to be studied strategically. Also, impact on Comino and known important marine features (e.g. caves) should be avoided in the first instance.	Comment noted. The Malta-Gozo fixed link is currently at study stage.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
275	Chapter 2 Road Transport Measure 2.2.7.1.	Joseph Incorvaja	25/06/2016	Proposal for Triq il-Kbira from R'dabout end Naxxar Rd to Lija Cemetery to develop the latter into a roundabout. Any crossings of cars from the opposite lane (in between the two roundabouts in Triq il-Kbira is to be forbidden, possibly also physically through the building of a central strip.	Measure 2.2.7.1; Project n. 7 Comment noted.
276	Chapter 2 Road Transport Measure 2.2.7.1	Dr. Nazzeno Azzopardi	25/06/2016	Proposal supporting the Gozo Tunnel as soon as possible including a Comino stage	Feasibility studies are currently being carried on the alignment on the Gozo Tunnel as a potential TEN-T Project as indicated under Measure 2.2.7.1.
277	Chapter 2 Road Transport Measure 2.2.7.1.	Gozo Regional Committee (GRC)	05/08/2016	The vast majority of the Gozo Regional Committee (GRC) members are in favour of the proposed tunnel link even though this is a very long term intervention. It is essential that the entrance/exit points at Gozo and Malta are identified at the earliest possible since these can have a direct impact on ancillary investments by the private sector.	Comment noted. Studying of the Malta-Gozo fixed link is addressed in Measure 2.2.7.1. Project 10.
278	Chapter 2 Road Transport Measure 2.2.7.1	Matthew Caruana	26/06/2016	Long terms plans could be: Underground service or additional underground roads; more flyovers to avoid the constant "stop and go" at crossroads	Comment noted. This has been addressed under 2.2.7.1. Grade-separated roads are considered along the strategic network where vehicle flow is given priority. Also refer to Measure 2.3.8.1
279	Chapter 2 Road Transport Measure	Paul Caruana	27/06/2016	The ramp that links regional road to the Marsa-Hamrun bypass (direction Marsa), which is found just after exiting the St Venera tunnels, needs to be widened from the current single lane to a two lane road.	Comment noted. The Removal of this bottleneck on the TEN-T Network is addressed in project 4 of Measure 2.2.7.1.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.7.1.				
280	Chapter 2 Road Transport Measure 2.2.7.1.	Paul Caruana	23/07/2016	The roundabout linking St Paul bypass, Burmarrad road and Kennedy drive needs to be upgraded to a multilayer junction. The current roundabout cannot cope with weekend traffic, leading to massive traffic jams.	Comment noted. This is addressed as Project 23 in Measure 2.2.7.1.
281	Measure 2.2.7.1	Gozo Regional Committee (GRC)	05/08/2016	Another issue related to connectivity is the road linking Ghajnsielem to Mgarr harbor. There is only one road and if there is an accident or structural failure, Gozo will come to a standstill. Therefore, it is recommended that the emergency link road (as identified in the Gozo & Comino Local Plan (2006) that runs parallel to this road is seriously considered without further delay. It must be acknowledged that there might be engineering challenges due to the type of geology (mainly blue clay) in the area, however this shall not preclude such investment. It must be brought to TM's attention that when an accident occurred on this stretch of road, the Gozo Ferries had to be delayed for more than an hour. The Transport Strategy shall also consider the possibility of a flyover on the main traffic roundabout before entering Victoria from Mgarr Road should be seriously considered.	Comment noted.
282	Chapter 2 Road Transport Measure 2.2.7.1	Ministry for Gozo	22/07/2016	At peak times, vehicles travelling between the islands spill over and occupy the road while waiting to board due to insufficient landside space for marshalling. This problem is further highlighted in Gozo since the last part of the road is the only gateway between the port of Mgarr and the rest of Gozo. If an accident happens and the road is closed the sea transport service between Gozo and Malta has to be halted (threat). There is a need to carry out studies for an alternative route between the port of Mgarr and Ghajnsielem to mitigate this threat and avoid disruptions in the port of Mgarr due to limited space. In view of the fact	Comment noted. This was studied in 2005 as part of the TEN-T feasibility studies for Gozo. However, it is not possible to include a new parallel, alternative link to the Mgarr Road on the TEN-T Comprehensive Network, as the network has already been defined in the new TEN-T guidelines.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				that Nodes GA34-GA44-GA37 refer to the road from Victoria past the tigrija to Nadur and then down from Nadur via Ghajnsielem/The Grand to the harbour (the uncompleted “TEN-T Comprehensive” network) it should be further emphasized that a bottleneck exists in Triq ix-Xatt, Mgarr. As already highlighted below this road is the only road that connects the ferry terminal with the rest of Gozo – should an accident happen, the only link between Gozo and Malta will be blocked. Therefore it is crucial that a study is conducted to indicate an alternative route to mitigate against this disadvantage.	
283	Chapter 2 Road Transport Measure 2.2.7.1	OPM Energy and Projects - Projects Malta	16/08/2016	Re the mentioned Malta Gozo fixed link, one must note that Government had mentioned that this project would involve private sector financing.	Comment noted.
284	Chapter 2 Road Transport Measure 2.2.7.1	Paul Caruana	25/06/2016	Proposal to widen the terminal part of Triq Vjal Aviazzjoni, as it reaches the roundabout that leads on to Triq Kunsill Ta L-Ewropa in Luqa, from two to three lanes. Similarly, the last part of Triq Vjal Aviazzjoni, as it reaches the roundabout at the other end (i.e. the roundabout near the new airport terminal) should also be widened to a three lane road.	Comment Noted. Infrastructure proposal will be referred to the competent directorate within Transport Malta – Roads and Infrastructure Directorate (RID)
285	Chapter 2 Road Transport Measure 2.2.7.1	Paul Caruana	25/06/2016	Proposal to upgrade the overpass which links Triq Dun Karm to the Regional Road (Direction Marsa) to be able to cope with an increased traffic flow. This junction has become a bottleneck during peak hours.	Comment Noted. Infrastructure proposal will be referred to competent directorate within Transport Malta - Roads and Infrastructure Directorate (RID)
286	Chapter 2 Road	Malta Chamber For Small &	18/08/2016	Traffic has to be channelled to secondary roads to reduce clogging where possible. Knowledge of secondary routes needs to be clearer to drivers. Nonetheless secondary roads cannot be pushed forward if they	Comment noted. A careful balance need to be struck between road service level and interaction with pedestrian cyclists

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Objective 2.2.8	Medium Enterprises (GRTU)		are not adequately improved. This applies both in the long-term as well as during projects. Minor changes and improvements to the present secondary road infrastructure with widening of knowledge and usability of GPS systems could give drivers from point-to-point to opt for secondary road usage rather than using main arteries for more short distance travel. This will also ensure that the secondary roads can be of support in cases of road closures or emergencies.	and bus services on secondary roads.
287	Chapter 2 Road Transport Measure 2.2.8.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	<p>It is being recommended that door numbers are reviewed due to various inconsistencies created over the years. There are a number of cases where numbers may be skipped due to new construction and tearing down of buildings over the years in the same street. A common system of how door numbers are allocated has to be put in place irrespective of the town so that it is easier to expect door numbers in cases of delivery for instance, irrespective of the town. Whilst also retaining house names, it is also important to allocate door numbers where this still does not exist.</p> <p>There is also need to have a national grid for streets which may be coded. Despite name changes of streets or existence of same street names in more than one town, each street will be coded. This will allow easier use of IT systems related to traffic operation and better understanding for logistics sector as well as in cases of emergencies.</p>	Comment noted. Transport Malta is in the process of digitising transport data and information using a Geographic Information System. The GIS will facilitate better planning of transport infrastructure provision and maintenance. The comment on door numbers will be forwarded to the competent authority responsible.
288	Chapter 2 Road Transport Measure 2.2.8.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure.	Comment noted.
289	Chapter 2 Road	Environment and	26/07/2016	The draft Master Plan proposes a review of the classification of roads, for example re-classification from local access road to a distributor road	Comment noted. This measure will be developed holistically taking into account

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Measure 2.2.8.1	Resources Authority (ERA)		<p>(see page 107). The environmental implications associated with such re-classification require clarification. Environment and Resources Authority (ERA)'s main concerns focus on: (i) the environmental consequences of any possible shifting of traffic pressures; and (ii) the type, extent and location of physical infrastructural projects and engineering works which could be required to implement the re-classification of roads in accordance with transport standards. The potential impacts of such re-classification and suitable alternatives need to be investigated further, including their cumulative and consequential impacts, in order to avoid (amongst others):</p> <ul style="list-style-type: none"> • additional take up of undeveloped rural land; • scarring or formalisation of the natural/rural landscape; • modification of site topography and features in rural locations; • degradation and damage to natural habitats and valley systems; • adverse impacts on the integrity, amenity and overall natural state of sensitive environmental sites whether in rural, coastal or marine locations; and • additional environmental impacts resulting from the shifting of traffic pressures onto particular roads and upgrading of transport infrastructure. 	social, environmental and economic impacts.
290	Chapter 2 Road Transport Measure 2.2.8.2 2.2.8.3 2.2.8.4 2.2.8.5 2.2.8.6 2.2.8.7	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Refer to approach suggested on point 2.2.7.1.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.8.8				
291	Chapter 2 Road Transport Measure 2.2.8.2 2.2.8.3 2.2.8.4 2.2.8.5 2.2.8.6 2.2.8.7 2.2.8.8	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with some of the proposed changes nevertheless it enquires whether these roads are able to take new facilities such as cycling and increased pedestrian facilities. Examples are the ND9, Route 127 and EA 16 which in our opinion are main thoroughfares. Given the infrastructure that has developed adjacent to the roads, it leaves them inadequate to include cycling lanes/paths on these routes. The proposed initiative is to redirect the bulk of traffic from these roads onto the Ten-T network which it is believed would create more congestion rather than lessen it as less alternative routes for heavy traffic will be provided.	This aim of this measure is to provide the optimal mix of transport modes (car, bus, bicycle, walking) on main roads that run parallel to the Strategic TEN-T Road Network, so they may be utilised as a safe alternative.
292	Chapter 2 Road Transport Objective 2.2.9	Bicycle Advocacy Group (BAG)	22/07/2016	Another way of financing new roads and infrastructure is to use modal shift and active transport savings – and importantly buy in by their opponents. On the one hand ‘as with many other European countries, the availability of needed funds to carry out all the necessary works in the short-term is not realistic. In recent years, infrastructure investment has steadily risen to an average of 0.88% of national GDP. The Transport Master Plan identifies the OECD international benchmark of allocating at least 1% of national GDP for maintenance, repair, construction, reconstruction and operation of transport infrastructure as best practice, and as a realistic target to aim for. (TNS, 2016) On the other hand cycling infrastructure has consistently been shown to deliver between 1.4 to 35 times the capital investment.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
293	Chapter 2 Road Transport Measure 2.2.9.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Government to undertake this measure. All authorities related to this measure need to be brought on board and a plan for maintenance and accountability in this sense. This would also help to have a centralised method of maximising resources and scheduling of maintenance/re-surfacing, etc.	Comment noted.
294	Chapter 2 Road Transport Measure 2.2.9.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with this measure.	Comment noted.
295	Chapter 2 Road Transport Measure 2.2.9.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	The Asset Management System should be set up for all roads. In our Lija study we found lack of resources and skill in the design, upgrade, and maintenance of local access roads. This lack of skill is a danger to the effective regeneration of our roads as public spaces for all.	Comment Noted. This is addressed in Measure 2.2.9.1 (para. 2) whereby after setting an Asset Management System for arterial and distributor roads, this will then be extended to include local roads.
296	Chapter 2 Road Transport Measure 2.2.9.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	It is important to avoid unnecessary clogging, congestion and damages.	Comment noted.
297	Chapter 2 Road Transport	Ministry for Sustainable Development,	17/08/2016	Water Scarcity is an issue which is being felt in the Mediterranean region and due to climate change there needs to be a close link to water management. In addition, the text does not include any reference to	Comment noted. This will be considered in more detail within storm water management referred to in Measure

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.2.9.2	the Environment and Climate change (MSDEC)		the Water Framework Directive. Moreover it would be useful if certain road infrastructure (e.g. centre strips, roundabouts etc) could be considered for integration within a sustainable urban drainage concept.	2.2.9.2.
298	Chapter 2 Road Transport Measure 2.2.9.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber fully agrees with this measure and that better planning is warranted between all stakeholders involved.	Comment noted.
299	Chapter 2 Road Transport Measure 2.2.9.2	Environment and Resources Authority (ERA)	26/07/2016	Measure 2.2.9.2 Increase the implementation of service culverts and storm water management in local roads refers. With regards to the storm water management it is to be noted that one of the measures included in Malta's National Biodiversity Strategy and Action Plan (NBSAP) states that where feasible, appropriate and cost-effective rainwater harvest technologies are to be adopted in urban and rural areas as an environmentally sound approach to address imbalances between water supply and demand, and thus ensure long-term water security in Malta.	Comment noted. Measure will be adapted to include sustainable storm water management
300	Chapter 2 Road Transport Measure 2.2.9.2	Matthew Caruana	26/06/2016	Better water management in the roads as the traffic increases when roads are inaccessible or flooded.	Comment noted. This has been addressed under Measure 2.2.9.2
301	Chapter 2 Road Transport	Malta Chamber For Small & Medium	18/08/2016	Ideally a review is conducted in the sense of having more consolidation and taking due consideration to visual impact. Accountability for upkeep is also necessary.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.2.9.3	Enterprises (GRTU)			
302	Chapter 2 Road Transport Measure 2.2.9.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure.	Comment noted.
303	Chapter 2 Road Transport Measure 2.2.9.4	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Benchmarks need to be set so that it is clear that any new roads or maintenance are made in line with set standards. It should not be acceptable to have any form of mediocre results which result in damages, waste of public funds and possible danger. Coming down heavily on who is responsible for ill-constructed roads is necessary. Local Councils also need to shoulder responsibility accordingly and where obligation of maintenance and upkeep is not maintained and funds would have been available for this, TM should ensure that it carries out the necessary works even if this would mean financing it from the Local Council's funds.	Comment noted.
304	Chapter 2 Road Transport Measure 2.2.9.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure. Examples of small countries that have managed to achieve good results can also be found outside of Europe such as the UAE, especially the Emirates of Abu Dhabi and Dubai, Oman and Singapore.	Comment noted.
305	Chapter 2 Road Transport Objective	George Debono	18/07/2016	Re data sets for accident data - Bicycle accidents are not documented.	Comment Noted. This will be referred to the competent authority (Malta Police) for Road Accident data collection.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.10				
306	Chapter 2 Road Transport Objective 2.2.10	Motor Insurance Association (MIA)	22/07/2016	The MIA supports greater use of publicity campaigns to educate drivers on driving safely. One important message would be to help drivers understand better when and how to use a “Front to Rear” accident form and the importance of not obstructing traffic flows in the process.	Comment noted. This measure has been broadly covered in Objective 2.2.10 and the Malta Road Safety Strategy 2014-2024.
307	Chapter 2 Road Transport Objective 2.2.10	Daniel Cauchi	15/07/2016	Motor vehicle driving licence: As far as I can make out, the current driving license theory exam makes absolutely no mention of bicycles or of actions that should be taken when driving in order to ensure that the driver keeps an eye out for cyclists. In countries like Germany, prospective drivers are required to demonstrate, both in theory and in practice, awareness of cyclists and pedestrians. Driving license examiners pay particular attention to trainee drivers’ behaviour with respect to cyclists on the road. Given that cyclists are unfortunately relatively rare in Malta due to the perceived danger of cycling, perhaps one component of the driving test could consist of a single road where they interact with cyclists. At the very least, the theory section of the driving test should be expanded to include examples of correct behaviour when interacting with cyclists. I believe that this would also be of benefit to motorcyclists.	The minimum requirements for the motor vehicle and motorcycle driver testing and training are regulated at an EU level. Additional testing and training is required for professional drivers through the certification process of professional competence (CPC). Minimum standards for CPC are regulated at an EU level. The inclusion of specific provisions relating to awareness of cyclists and motorcyclists will be discussed internally within Transport Malta.
308	Chapter 2 Road Transport Measure 2.2.10.1	Motor Insurance Association (MIA)	22/07/2016	The MIA supports the introduction of incentives that encourage drivers to undertake voluntary advanced driver training, insurers can support these by offering more favourable insurance terms to such drivers.	Comment noted. This measure is contained in the Malta Road Safety Strategy 2014-2024. Measure 2.2.10.1 addresses the continued implementation of this road safety strategy.
309	Chapter 2	Motor	22/07/2016	Modern vehicles have many in-built safety features, most of which	Comment noted. This measure is broadly

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Road Transport Measure 2.2.10.1	Insurance Association (MIA)		triggered by sensors and are built from materials that are designed to reduce the risk of injury to occupants. A repairer or mechanic must therefore have all the necessary skills, knowledge, tools and equipment to have such vehicles repaired in accordance with the manufacturer's methods and procedures to ensure that none of these safety features are compromised. Vehicles that are repaired incorrectly present a greater risk of being involved in an accident, and increase the risk of serious injury to occupants if this occurs. Therefore it is essential that repairers and mechanics should be subject to rigorous inspections to ensure that they are able to meet the required standards. Insurers in Malta have already taken the initiative to try and raise the standard of vehicle repairs in Malta, and therefore the MIA feels that greater support is required from the relevant authorities, including Transport Malta, to help reach this important objective.	contained in the Malta Road Safety Strategy 2014-2024. Measure 2.2.10.1 addresses the continued implementation of this road safety strategy.
310	Chapter 2 Road Transport Measure 2.2.10.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure.	Comment noted.
311	Chapter 2 Road Transport Measure 2.2.10.2	Motor Insurance Association (MIA)	22/07/2016	The type and condition of vehicles on the road undoubtedly have a direct impact on the number of type of accidents that occur. Motor insurance premiums are calculated in such a way as to penalise those vehicles that present a greater risk of causing an accident, as claims data clearly demonstrates a correlation between the speed of the vehicle and the frequency of accidents, and between the vehicle's kerb weight and the severity of an accident. It is also a fact that older vehicles are less safe when compared to more recent ones since the latter possess several safety features to protect the drivers and passengers from injury, and to reduce the possibility of an accident happening.	Comment noted. This is the aim behind measure 2.2.10.2.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
312	Chapter 2 Road Transport Measure 2.2.10.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure.	Comment noted.
313	Chapter 2 Road Transport Measure 2.2.10.1 2.2.10.2 2.2.10.3 2.2.10.4	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	All road safety measures are welcome. With regard to any fundamental shifts such as that proposed in 2.2.10.2 should be implemented in a gradual manner.	Comment noted.
314	Chapter 2 Road Transport Measure 2.2.10.3	Therese Bajada	07/07/2016	The inclusion of transport research in undergraduate and postgraduate curricula in different subjects is an important component. It is also necessary, however, to educate the young generation (in primary and secondary schools). There needs to be more emphasis and information about the implications of car use. At the same time, however, it is important to improve the existing services, and lead by example (even by main institutions, particularly the regulator), so that the current 'adult' generation changes the idea about the car.	Comment Noted. This has been addressed in Measure 2.2.2.1
315	Chapter 2 Road Transport Measure 2.2.10.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
316	Chapter 2 Road Transport Measure 2.2.10.4	Therese Bajada	07/07/2016	In view of the recent proposals, include standards for the development of marine bridges and tunnels.	Comment noted. Design and construction standards are defined in national law (which also transposes and EU Regulation concerning Safety Standards in TEN-T Road Tunnels).
317	Chapter 2 Road Transport Measure 2.2.10.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with the proposed measure as the vast majority of the this infrastructure was built between the 1960s and 1990s.	Comment noted.
318	Chapter 2 Road Transport Measure 2.2.11	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	The first sentence of this section suggests the need for more (road) capacity rather than restraint on car use. Even though it is the correct definition of why congestion occurs, it is not correct to ignore the impacts and costs associated with increasing capacity in an attempt to solve congestion. As mentioned earlier increasing capacity does not resolve the issue of congestion due to induced demand. Even more when there are constraints on land and land resources in Malta. The first sentence might suggest that there is spare capacity on the islands.	Comment noted. Measure 2.2.11 has been amended to reflect the feedback.
319	Chapter 2 Road Transport Measure 2.2.11.1	Matthew Caruana	26/06/2016	Traffic lights should be able to adapt to current traffic situations, however, as an interim before a more intelligent system is introduced, I would recommend doing a study and set traffic light with a day and night time settings	Comment noted. Current traffic light junctions have different time plans according to day and night peak and off peak periods. Certain traffic signal junctions used vehicle activated loop. As part of the ITS Modus Project, major signal junctions will be upgraded to provide optimised coordinated signalling. Refer to Measure 2.2.11.1

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
320	Chapter 2 Road Transport Measure 2.2.11.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	In relation to the use of Smart Technologies and ITS for enforcement, it should also be noted that any monitoring/recording devices should be utilised for the purpose they are being installed for and not to serve as an income-generation tool for enforcement agencies by imposing fines based on delivery vans and other related operations in key areas (refer to point 6 above).	Comment noted.
321	Chapter 2 Road Transport Measure 2.2.11.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber agrees with this measure but believes that the system which has been in place since 2014 needs faster implementation in order to use its full potential.	Comment noted.
322	Chapter 2 Road Transport Measure 2.2.11.1	Motor Insurance Association (MIA)	22/07/2016	Insurers are increasingly using telematics technology in order to charge a premium that is more reflective of the risk. At their most basic levels these devices record the vehicle's geo location at any given point in time, so it is possible to also extract data relating to speed and distance travelled. It is very likely that insurers can collaborate with TM or other authorities to use this data in order to carry out relevant studies to address particular problems.	Comment noted.
323	Chapter 2 Road Transport Measure 2.2.11.1	Motor Insurance Association (MIA)	22/07/2016	The deployment C-ITS (Cooperative Intelligent Transport Systems) offer innumerable opportunities for managing traffic and the risk of road accidents better. The cooperative nature of C-ITS lies in the collecting and processing of data from different sources (such as vehicles, infrastructure and sensors) and sending this data to all transport users (drivers, passengers, cyclists, pedestrians, road authorities, freight planners etc...) so they can take well-informed decisions, anticipating and avoiding congestion and accidents. C-ITS can cover a very wide range of different services, such as improving road safety by avoiding accidents and reducing their severity, for example by warning for emergency braking manoeuvres of cars just ahead or when rapidly	Comment noted. The Measure 2.2.11.1 promotes the use of ITS to alleviate traffic congestion. In addition, Measure 2.8.3.4. now promotes the exploitation of Big Data

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				approaching slowing traffic. They can help in decreasing congestion by optimising performance and available capacity of the existing road transport infrastructure, or by giving optimal speed advice to drivers in urban environments (GLOSA) to reduce stop times and unnecessary acceleration and deceleration. All of these services will benefit travel time reliability, reduce energy use and create secondary beneficial effects such as reduced driver fatigue and reduced mechanical wear. It is therefore of importance that access to such data, in particular to in-vehicle data, is not denied or unreasonably limited as this can be of invaluable importance to both insurers and any forensic investigators, particularly in the case of serious traffic accidents.	
324	Chapter 2 Road Transport Measure 2.2.11.1	Joseph Incorvaja	25/06/2016	Proposal to install bus activated traffic lights at the main road and narrow hill of Mellieha (Triq G Borg Olivier) to stop all cars until the bus goes through.	Comment noted. Will be considered under Measure 2.2.11.1
325	Chapter 2 Road Transport Measure 2.2.11.1.	Paul Debono	27/06/2016	Do we have to fix a traffic light every few hundred meters? It's been proven that traffic lights do cause congestion. They need to be intelligent and exercise control according to traffic flow. In most cases, Pelican lights are more suitable.	Comment noted. The coordination of traffic signals and pelican lights is addressed in Measure 2.2.11.1. on use of Intelligent Transport Systems and Traffic Management
326	Chapter 2 Road Transport Measure 2.2.11.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	The pilot Marsa Tidal Lane has proven to be a good measure. It is welcome to attempt to apply this measure in other areas where possible and as per traffic needs.	Comment noted. This is addressed in Measure 2.2.11.2

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
327	Chapter 2 Road Transport Measure 2.2.11.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Chamber believes that with some minor modifications in the schedules proposed for the pilot project, the information received about the new system has been overwhelmingly positive. The issue remains immediately after one drives through Sir Boffa Avenue; one finds another bottleneck in the next two roundabouts.	Comment noted.
328	Chapter 2 Road Transport Measure 2.2.11.3	Matthew Caruana	26/06/2016	Similar to the waste collection services, the timings of road maintenance and ELC watering services need to be planned better.	Comment noted. This has been addressed in Measure 2.2.11.3
329	Chapter 2 Road Transport Measure 2.2.11.3	Karen M. Zammit Manduca	19/07/2016	<p>As for co-ordination, this should be up to the local council of the area to co-ordinate in such a way that there will not be too much disruption in any one area. The councils should have a central body to co-ordinate between one locality and another. The use of cranes and heavy plant machinery in residential/commercial areas must not be allowed before 9am, when most people would have left home and reached their place of work, as these are often a source of delay and much antagonism on the roads. Too often, contractors 'block' entire sections of roads from the day before to ensure that they can begin work by 7am, and sometimes (illegally) earlier. Residents are unable to park when returning home from work and/or need to move cars before it is time to leave for work. Likewise, these heavy vehicles should be moved before 5pm when people begin to return home after work.</p> <p>Once again, permits for building works allowed in any one area need to be co-ordinated and controlled. Very often, in towns like Sliema, lack of co-ordination means that vehicles have to pass the wrong way through</p>	Comment noted. These are addressed in Measure 2.2.11.3

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				one-way streets because all the 'correct' roads to take are blocked by machinery – often causing traffic tailbacks.	
330	Chapter 2 Road Transport Measure 2.2.11.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
331	Chapter 2 Road Transport Measure 2.2.11.3	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Local Councils should be given more incentives to work together whereby joint work and larger scale work could prove more efficient and cohesive.	Comment noted. This will be referred to the competent authority (Department for Local Government).
332	Chapter 2 Road Transport Measure 2.2.11.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
333	Chapter 2 Road Transport Measure 2.2.11.4 2.2.11.5	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Positive measures for effective and efficient planning are welcome.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
334	Chapter 2 Road Transport Measure 2.2.11.5	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
335	Chapter 2 Road Transport Measure 2.2.11.6	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	<p>There are issues in Malta that can be mitigated. For instance we know that every summer we have arterial roads blocked due to village feasts weekend in and weekend out. There needs to be a blueprint plan which coordinates and diverts traffic to produce solutions that mitigate the traffic caused. If a major road is closed for a weekend due to processions and festivities, then during that weekend a secondary road needs to be planned to be changed into a dual-carriage way temporarily to ease off the pressure caused by the initial closure, even if it may mean having different parking arrangements for one day. This would also help drivers know ahead of the traffic arrangements. Moreover permits cannot be issued blatantly without having given all other due considerations and alternatives and weighing out the repercussions for any closures. Closures given green light by the locality's mayor on its own may not be taking into consideration other options or repercussions on the greater picture. Transport Malta needs to be involved and there should be adequate considerations and alternatives when such decisions are taken.</p> <p>The same applies with the situation of flooding in winter time. As all are aware heavy rains in Malta result in traffic closures. A similar emergency plan should be devised so that authorities and general public are aware of which roads not to use and which diversions would be made available in such situations.</p>	Comment noted. This is addressed in 2.2.11.6 and 2.2.11.7.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
336	Chapter 2 Road Transport Measure 2.2.11.6	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	<p>Investing in parking facilities for employees and coordinating joint trips by employees within the same company or across companies in proximity should be major points of incentivisation to employers. Employers are ready to take this step but need measures to support them as these come at a significant cost. This could significantly reduce unnecessary traffic and emissions. This could include employees, visitors, students, and other as applicable – for instance University, Hospitals, Junior College, MCAST, Government Departments, Industrial Estates, etc.</p> <p>A further addition could be a point-to-point service outside of the route of Public Transport operated by private operators to solve issues where Public Transport is not reaching or where it is not meeting the demand. This would also include an operational service within hubs or from and to town centres to surrounding villages to avoid short-distance personal car travel. There could also be incentives for private operators to provide shuttle service during rush hour between localities as well as hubs that attract masses such as feasts, entertainment activities, concerts, etc.</p>	Comment noted. Measure 2.2.2.2 addresses the issues of incentivising private collective transport (such as car-pooling, and shared mobility). It also promotes the concept of Green Travel Plans where employers can be encouraged to organise private collective transport for workers to reduce impact of private individual transport on the road network. In addition, point-to-point transport for low areas of low demand is addressed in Measure 2.3.8.2.
337	Chapter 2 Road Transport Measure 2.2.11.6	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
338	Chapter 2 Road Transport Measure	Matthew Caruana	26/06/2016	Wardens and Police clearing out accidents quicker to remove bottlenecks	Comment noted. This has been addressed under Measure 2.2.11.7

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.2.11.7				
339	Chapter 2 Road Transport Measure 2.2.11.7	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Emergency Wardens and Tow-Trucks need to be placed at the vicinity of the affected areas in cases of major projects and also perhaps in specific key arteries during peak hours. These would treat with emergency any possible collisions without effecting traffic allowing immediate removal of such vehicles avoiding blockages.	Comment noted, developing a framework for national coordination and management of road works is addressed in Measure 2.2.11.3.
340	Chapter 2 Road Transport Measure 2.2.11.7	Motor Insurance Association (MIA)	22/07/2016	The MIA supports greater efficiency by the police and the traffic wardens to intervene quickly on the site of collisions in order to remove obstructions to traffic flows after having photographically recorded the scene and taken the necessary measurements.	Comment noted. This has been broadly addressed in Measure 2.2.11.7
341	Chapter 2 Road Transport Measure 2.2.11.7	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
342	Chapter 2 Road Transport Objective 2.2.12.	Bicycle Advocacy Group (BAG)	22/07/2016	BAG members have found a 1900w foot scooter on Tower Road, and regularly encounter motorized (petrol) bicycles where the rider is not pedalling (sustained effort), yet enforcement is not apparent. This has led to the regulatory framework being seen as a joke and merely a CYA policy in the event of an accident.	Comment noted. Refer to Measure 2.2.12.1
343	Chapter 2 Road	Vivian Thompson	04/07/2016	The proposed implementation [of the TMP] will be highly successful but it is also important to consider the bad drivers who are constantly speeding, texting and making calls from mobile telephones, jumping red	Comment noted. Comments will be addressed under Objective 2.2.12 and Measure 2.2.12.5.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport Objective 2.2.12			lights, undertaking, overtaking dangerously and drivers on the highway with children on this laps or having children moving about in the moving vehicle. If the police were proactive and vigilant on the roads the concerns would not be so bad. Drivers should be given points for contravening traffic rules and this alone would get the most dangerous of the roads.	
344	Chapter 2 Road Transport Objective 2.2.12	Matthew Caruana	26/06/2016	Better policing and educational services to avoid double parking, not choosing their right lanes, cars in traffic stopping at junctions and not leaving the crossing areas free, etc.	Comment noted. This has been addressed under Objective 2.2.12 and respective Measures
345	Chapter 2 Road Transport Objective 2.2.12	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Enforcement measures suggested in this section show an intention towards ensuring that rules are kept and implemented in a more effective manner. Enforcement is essential to ensure that measurers and regulations are followed. Nevertheless it is important to ensure that these are implemented in a manner which is set to educate and not have a draconian approach. A practical approach is solicited.	Comment noted.
346	Chapter 2 Road Transport Objective 2.2.12	Joseph Incorvaja	04/07/2016	Proposal to consider enforcement as we have enough laws to reduce congestion but these are useless unless enforced. Examples such as: haphazard parking especially on bus-stops and monitoring of all major roads such as Hamrun, are given.	Comment noted. This is addressed under Objective 2.2.12
347	Chapter 2 Road Transport Objective 2.2.12,	George Debono	18/07/2016	Universal 30 km/h speed limit enforcement in the urban context is impossible. This has to be supported by traffic calming and road design modification which make drivers instinctively proceed more carefully.	Comment noted. This is addressed in Measure 2.2.5.1 which will incorporate design guidance related to traffic calming and self-regulating vehicle speeds in urban areas.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
348	Chapter 2 Road Transport Measure 2.2.12.1.	Motor Insurance Association (MIA)	22/07/2016	The MIA supports a stronger investment in traffic police and other resources to ensure more effective enforcement. This includes an adequate number of personnel, as well as the provision of the necessary tools such as speed (radar) guns and roadside breathalyser kits.	Comment noted this is largely addressed in Measure 2.2.12.1.
349	Chapter 2 Road Transport Measure 2.2.12.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	Although the Chamber appreciates the need to enforce and freight traffic illegalities, it is our opinion that delivery vehicles should not be singled out given that the road infrastructure is in many instances not conducive for drivers to find legal parking. One example is the fact that loading/ unloading bays are usually taken by the general public with truck and van drivers resorting to double park to deliver a service to the community. It is also important that most towns with limited vehicular access have unreasonable systems which require updating. This includes Paceville and St Julians in general and Sliema. For example, in Paceville there exists a leeway of only three minutes for delivery vehicles to alight without getting fined and deliver all their goods or services in an area which is densely populated by commercial and entertainment units. The Chamber believes that such a time window needs to be expanded especially during off peak hours when Paceville is practically deserted. The Chamber has held meetings with LESA, CVA and the St Julians Local Council but similar proposals can be put forward for other localities with similar problems.	Comment noted. This measure would apply to all road users acting in violation of traffic regulations.
350	Chapter 2	Malta Chamber of	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Road Transport Measure 2.2.12.2	Commerce, Enterprise and Industry			
351	Chapter 2 Road Transport Measure 2.2.12.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
352	Chapter 2 Road Transport Measure 2.2.12.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal as long as this measure is applied to all vehicles on the road and that commercial vehicles are not singled out as they could be easier to spot given that many private vehicles cannot be considered roadworthy.	Comment noted. This will apply to all vehicles. However, the carrying out of roadworthiness testing on commercial vehicles is specifically regulated under Directive 2014/45/EU on periodic roadworthiness testing vehicles and under Directive 2014/47/EU on technical roadside inspection of vehicles for roadworthiness; in both cases as transposed into Maltese law.. This includes specific safety tests on goods carrying vehicles.
353	Chapter 2 Road Transport Measure 2.2.12.4	Motor Insurance Association (MIA)	22/07/2016	MIA supports initiatives that ensure that the Vehicle Roadworthiness Tests are effective as insurers still come across vehicles when handling claims that appear not to be roadworthy. Particular attention needs to be given to the vehicle's tyres which in some cases do not have a sufficient thread depth or have splits, lumps or bulges.	Comment noted. Measure 2.2.12.4 addresses the issue of roadworthiness testing carried out when vehicles are in circulation on Maltese roads in-between periodic roadworthiness tests.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
354	Chapter 2 Road Transport Measure 2.2.12.5	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal and should be extended to all drivers not only for three years as it is at present for new drivers but for the rest of one's driving life. The system could be implemented on a five-year basis whereby 30 points are allocated. Thereafter, the points which are not claimed during that period will be transferred to the next five-year period acting as an incentive to drive in a proper way. Drivers who do not commit any infractions or illegality after 10 years can be rewarded with a cheaper road licence fee. Nevertheless, such a measure needs to be coupled with a strong presence of enforcement officers.	Comment noted. This proposal is included as a Strategy Objective in the National Road Safety Strategy 2014-2024 and thus considered in Measure 2.2.10.1.
355	Chapter 2 Road Transport Measure 2.2.12.6	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
356	Chapter 2 Road Transport Measure 2.2.12.7	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal as long as freight vehicles which descend in any terminal are randomly checked and that it does not apply only to vehicles which arrive at VGT or the Freeport. It is important that the introduction of weighbridges applies to all maritime terminals including island to island transportation, and other connection such as the Malta-Sicily route.	Comment noted.
357	Chapter 2 Public Transport	Aimee Borda	09/08/2016	improvement of Public Transport - (1) alternative options to buses should be considered as regardless of how optimistic the plan is, the ugly truth is that buses get stuck in traffic (2) Reduce the number of bus stops - make 2/3 of the bus stops applicable only to elderly, pregnant	Comment noted. An efficient PT system is in line with Objective 2.3.1. This proposal has been addressed specifically in measures such as (1) Measure 2.4.2. Wi-fi

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.3.1			women, handicapped. Personally I always stopped 3 stages ahead of home as the time taken to walk and arrive by bus was the same. (3) have wi-fi on buses so people can get some work done on their commute (4) Express buses like for example to university should not let people down at earlier stops. This discourage people going e.g. to Valletta from using that bus and when the bus is full it can take alternative routes (in case of traffic or accidents) as the next stop would be the university not the next 100m. Giving the drivers some flexibility will go a long way as they know the roads the most.	on buses is addressed in 2.3.1.1. With regard to (2) and (4), these will be discussed internally within TM.
358	Chapter 2 Public Transport Objective 2.3.1	Environment and Resources Authority (ERA)	26/07/2016	Reference is being made to Figure 81. Existing and Future Hierarchy of Employment Nodes. It is being noted that Smart City has not been earmarked as a future employment node, despite the IT-retail-commercial-tourism-medical uses envisaged for this area. This appears to contradict later reference (p.135) to the importance of this hub.	Fig 81 is only showing Existing Hierarchy of Employment Nodes and not Future. The future employment is identified in Fig 88. Minor amendments to text of operational objective 2.3.1 will be made.
359	Chapter 2 Public Transport Objective 2.3.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Public Transport use is definitely a key indicator towards understanding if there is a shift away from private car dependency. Figures show improvement that is reflected in better service. More improvements are welcome. As highlighted in this section however, it is clear that it cannot yet meet the demand necessary and reflect the needs of a wide variety of potential users. Rather than solely incentivising the operation of Public Transport itself, it is necessary to view the operation of Public Transport within the context of support and cooperation with private collective transport operation. This needs to cater for different clients, specific needs, unsustainable routes and schedules (such as short distance point-to-point options), that the Public Transport operation on its own, no matter how improved will not be able to respond to. Various points have been put forward such as in points 15 and 17 above but one should study and explore various options other than solely focusing on the traditional Public Transport on its own.	Comment noted. Measure 2.2.2.2 addresses the issues of incentivising private collective transport (such as car-pooling, and shared mobility). It also promotes the concept of Green Travel Plans where employers can be encouraged to organise private collective transport for workers to reduce impact of private individual transport on the road network.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
360	Chapter 2 Public Transport Measure 2.3.1.1.	Justin Zarb	22/07/2016	Dedicated bus lanes SHOULD be modelled in detail and introduced in critically congested areas before money is spent on mass rapid transit studies.	Areas of high bus patronage and high traffic congestion have been identified in the modelling carried out in support of the Transport Master Plan. Measure 2.3.1.1 addresses the issue of improving the reliability and punctuality of bus service by introducing a number of Public Transport Quality corridors.
361	Chapter 2 Public Transport Measure 2.3.1.1	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	The strategy for Public Transport priority integrated with park and ride facilities would appear to need to extend further than that shown on page 130 of the 2025 Master plan document. The figure shown here suggests that commuters approaching the conurbation in many outlying areas (e.g. approach to Marsa P&R from Qormi and Luqa areas) will continue to cause severe congestion, with associated effects, unless the reach of Public Transport priority is extended further afield. Analysis also needs to be undertaken to understand why the P&R facilities outside the one at Floriana appear to have met with little (Marsa) or no (Pembroke) success.	Park and Ride systems should be seen in the wider context of a package of other demand management and modal shift measures
362	Chapter 2 Public Transport Measure 2.3.1.1 2.3.1.3	Martin Bugeja	02/07/2016	Although an improvement on Arriva, present bus service still requires improvement mainly in terms of punctuality	Comment noted. This has been addressed under Measure 2.3.1.1 & 2.3.1.3
363	Chapter 2 Public Transport Measure	University of Malta - Institute of Climate Change and	16/08/2016	The Master Plan identifies important bus corridors. It should also propose bus priority (even segregation) along these corridors to support the Public Transport service delivery.	Comment Noted. This has already been addressed in Measure 2.3.1.1

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.3.1.1	Sustainable Development (ICCS)			
364	Chapter 2 Public Transport Measure 2.3.1.1 2.3.1.3	Therese Bajada	07/07/2016	It is necessary to ensure that punctuality and reliability issues are addressed, and avoid secondary issues that derive from these main problems. Secondary issues include for instance, excessive driving (by bus drivers) to reach destinations on time and leaving customers behind on bus stops. The focus of service quality should be on punctuality and less crowding on buses and bus stops.	Comment noted. Measures 2.3.1.1 and Measure 2.3.1.3 aim to address this.
365	Chapter 2 Public Transport Measure 2.3.1.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
366	Chapter 2 Public Transport Measure 2.3.1.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
367	Chapter 2 Public Transport Measure 2.3.1.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
368	Chapter 2 Public Transport Measure 2.3.1.5	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
369	Chapter 2 Public Transport Objective 2.3.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	As mentioned previously, the widespread adoption of P&R needs to be studied. There are currently no updated figures on P&R use (not even in these documents) and our preliminary studies show that further research is required for this measure. <i>Attard, M. (2011) A preliminary assessment of the Park and Ride Scheme in Floriana, Malta. Paper presented at the International Conference on Sustainable Development organised by Kamra Tal-Periti (Chamber of Architects & Civil Engineers and the European Council of Civil Engineers, Malta.</i>	Comment noted. Transport Malta will be carrying out the necessary qualitative and quantitative surveys in relation to the development of Measure 2.3.2.1.
370	Chapter 2 Public Transport Measure 2.3.2.1	Matthew Caruana	26/06/2016	Introduce a frequent circular minibuss (not huge buses) service in key areas that will encourage people to park on the outskirts of village/area thus reducing the need for people to keep driving into the heavy congested areas with the hope of finding parking right next to the shop they need. Similar to a park and ride system but with few stops and frequent service and without a specific parking lot (an informal park and ride system)	Comment noted. Measure 2.3.2.1. has been updated to consider the option of identifying informal parking areas and providing circular bus routes
371	Chapter 2 Public Transport Measure 2.3.2.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
372	Chapter 2 Public Transport Measure 2.3.3.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
373	Chapter 2 Public Transport Measure 2.3.3.2	Environment and Resources Authority (ERA)	26/07/2016	Measure 2.3.3.2 Identify Strategic Transportation Hubs And Transit Corridors Where The Concept Of Transit Oriented Development Can Be Strengthened To Inform The Spatial Planning Process, also refers. A conceptual map indicating where mass transit development is desirable in view of population densities, road network and other parameters would have been beneficial to understand this section. It is also being recommended that this measure and measure 2.3.8.1 are to be cross-referenced (Continue The Planning And Development Of A Mass Rapid Transit System With A View To Establishing A Detailed Proposal For Public Consultation).	Comment noted. This is the aim of Measure 2.3.3.2. A Development Framework would include such a conceptual map.
374	Chapter 2 Public Transport Measure 2.3.3.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	Any study on metro systems will demonstrate that Malta does not have the capacity required for a metro system to be sustainable. This excludes the potential engineering problems due to the unknown geology. The Master Plan should not make reference to systems which in principle do not apply to Malta's size and population.	Comment noted. However, a feasibility study requires an option analysis which comprises a long-list option-sifting process, the identification of preferred and alternative leading to the identification of preferred solutions. It is not standard practice to discard options without a scientific basis. Furthermore, a feasibility study needs to take into account future land-use development and scenario-testing. These processes will be carried out as mentioned in Measure 2.3.8.1 and

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
					Measure 2.2.1.2.
375	Chapter 2 Public Transport Measure 2.3.3.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
376	Chapter 2 Public Transport Measure 2.3.3.2.	Ruben Farrugia	27/06/2016	Proposal to develop a main hub/terminal in Ta' Qali since it is central of Malta and has a lot of joining roads not like Valletta or other sub terminals	The location of bus hubs need to be carefully studied. The location of transport hubs is addressed in Measure 2.3.3.2.
377	Chapter 2 Public Transport Measure 2.3.4.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	Commercial and residential areas are important for Public Transport accessibility. So are important nodes such as Mater Dei/University of Malta, Junior College, Gzira and Mosta Health Centres just to name a few.	Comment noted. Measure 2.3.4.1 has been amended accordingly to address bus waiting infrastructure in general.
378	Chapter 2 Public Transport Measure 2.3.4.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
379	Chapter 2 Public Transport Measure 2.3.4.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
380	Chapter 2 Public Transport Measure 2.3.5.1	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	Inter-modal stations and P&R facilities need to be better integrated, through urban design, into the urban fabric, encouraging commuters to approach these facilities through walking or cycling. The Marsa P&R for example, illustrates many design deficiencies that render pedestrian connections to the adjacent urban fabric especially poor and also make it unpleasant as a place to stay and wait.	Comment noted. Measure 2.3.5.1 addresses this. Further emphasis will be made on the need to better integrate such facilities through urban design.
381	Chapter 2 Public Transport Measure 2.3.5.1.	Michael Scicluna	25/06/2016	Suggestion to split the Bus Stop at Msida corner with Rue D'Argens such that only buses proceeding to Sliema will stop, while buses proceeding to Valletta will be made to stop further on past the police station	Comment noted. Will be considered under Measure 2.3.5.1.
382	Chapter 2 Public Transport Measure 2.3.5.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
383	Chapter 2 Public Transport	Ministry for Sustainable Development, the	17/08/2016	Although the title of the measures relates to the improvement of the Environment, there isn't a detailed explanation within the implementation of this measures from an environmental point of view	Comment noted. Detailed proposals have recently been published by the Grand Harbour Regeneration Corporation (GHRC).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.3.5.2	Environment and Climate change (MSDEC)			
384	Chapter 2 Public Transport Measure 2.3.5.2	Philip Xuereb	25/06/2016	Proposal to rethink the Valletta terminus. The part in the ditch near to the ex-National Lottery building is too far from City Gate even in normal circumstances. In summer, shelter from the sun is scanty. It would be worse still in the rain and cold wind in winter. This is not only waiting for the bus, but also to arrive there. Especially in inclement weather, when one has to walk the whole unsheltered stretch out of Valletta, from South Street and over the bridge. The previous space of the terminus round the Tritons Fountain ought to be reconsidered. As it is now, it is choked with buses parked, not being in service.	Comment noted. Detailed proposals have recently been published by the Grand Harbour Regeneration Corporation (GHRC).
385	Chapter 2 Public Transport Measure 2.3.5.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal, but this has to materialise in the framework of the recently launched project to embellish the entrance to Valletta.	Comment noted. This proposal will be considered within the framework of the current plans for the embellishment of the City Gate/Triton Fountain area.
386	Chapter 2 Public Transport Measure 2.3.5.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	As long as the short to medium term financing can come from sub-contracting certain TM facilities to private operators or EU funding, the Malta Chamber agrees with the proposal.	Comment noted.
387	Chapter 2 Public Transport Objective	University of Malta - Institute of Climate Change and	16/08/2016	More data are required to analyse in detail the issues surrounding school transport. NHTS data does not capture nuances related to these issues. A cost-benefit analysis is required on the service being currently provided for free for state schools and at a fee for others. Issues related to lack of use, early timings, perception of low security and safety,	Comment noted. Comment on free transport for state schools will be referred to relevant authority (Ministry for Education and Employment).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.3.6	Sustainable Development (ICCSD)		driver behaviour are amongst the concerns which have never been studied.	
388	Chapter 2 Public Transport Objective 2.3.6	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	<p>School transport results in stress to traffic congestion which is clearly felt during the school months. Collective private school transport needs to be incentivized in order to ensure that transporting students to their education remains efficient and serves its purposes while minimizing its effect on traffic.</p> <p>To this end, collective private school transport for independent and church schools should be subsidized by Government in the same way that it is in the case of public schools. This would alleviate traffic pressure as it would avoid additional single private cars driving children separately to the same areas. This would also be accompanied by giving priority to collective private transport in school areas whereby individual parents collecting children would not be allowed the same level of access that results in congestion. Students using private collective transport would be allowed first in order to ensure that the collective transport is incentivized and not have single private cars block access to collective transport. This also applies in general traffic management in the same way it is given to Public Transport.</p> <p>Serious consideration has to be given towards widening school opening and closing times. This has to be undertaken after wide consultation however having all schools across the island with opening times and closing times being very close to each other have resulted in pressure on traffic. Widening the national window by staggering school daily commencement and completion over a set time would alleviate heavy pressure being put on traffic during rush-hour.</p>	Comment noted. Unscheduled Public Transport for Schools will be reviewed under Measure 2.3.6.1.
389	Chapter 2	Ministry for Sustainable	17/08/2016	Since children are exposed to high level of noise and to bad air quality in the morning , this Section needs to be discussed in further detail in	Measure 2.2.2.2 addresses initiatives to reduce travel demand (such as flexible

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Public Transport Measure 2.3.6.1	Development, the Environment and Climate change (MSDEC)		order to implement concrete actions to be implemented in Short Term Plans. The Air Quality Plan indicates measures such as Flexibility at work and Car Pooling which can be further integrated in the measure.	work hours at and car-pooling) whilst 2.3.6.1 specifically addresses school transport services.
390	Chapter 2 Public Transport Measure 2.3.6.1	Ministry for Education & Employment, MEDE, Feedback on White Paper for School Opening Hours and Traffic Congestion 2015	30/06/2016	On school transport, recommendations include an improvement of services, the re-introduction of regional termini, supervised school transport, student transport cards (free) to secondary students as well as to all higher secondary, MCAST and University students and the introduction of measures to discourage the use of private transport. Car pooling and the importance of offering incentives for more people to share private transportation was suggested by 10% of all respondents. Three mail messages recommend restricting the immediate area around schools to organised school transport only so that parents wishing to ensure that their children are driven directly to the school doorstep are discouraged to use private transport. 23 individuals recommend the introduction of free Public Transport to all schools, including church and independent schools. Whilst some respondents believe that church and independent schools should take responsibility for the organisation of school transport, others believe that all school transport should be centralised and should be in the hands of the Ministry for Education.	Comment noted.
391	Chapter 2 Public Transport Measure 2.3.6.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber believes that unless school hours are extended to incorporate other extra -curricular activities such as catechism and sports activities, the problem of having another rush hour from 1pm to 3pm will be retained. As stated in the document there are a number of issues in relation to transportation to and from Church and Independent schools. This emanates from the fact that these schools are not necessarily situated where the kids reside, unlike public schools and therefore they have to rely on private modes of transportation.	Comment noted. All these points will be considered during the review that is the objective of the measure.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<p>Nevertheless, parents still prefer to take their kids to school via their private cars because of 3 main reasons (1) Unscheduled Bus Systems (UBS) are unreliable or else pick up kids at very early hours (at times children as young as six have to spend close to 2 hours on a bus so that the driver can maximise his trip); (2) there is general perception that UBS drivers have little or no discipline and drive erratically endangering the children's safety and (3) they are considered expensive.</p> <p>Unless these 3 main issues are addressed the tendency of parents resorting to their car to take their children to school will continue or potentially increase.</p>	
392	Chapter 2 Public Transport Measure 2.3.6.1	Ministry for Education & Employment, MEDE, Feedback on White Paper for School Opening Hours and Traffic Congestion 2015	30/06/2016	7.6% feel that schools should be regionalised and that this should also apply to church schools. According to the comments received, this would reduce longer travelling time to and from schools for both teachers and pupils.	Comment noted.
393	Chapter 2 Public Transport Measure	Ministry for Education & Employment, MEDE, Feedback on	30/06/2016	There were two recommendations for the introduction of buses that go to higher secondary institutions directly from villages and towns, similar to Public Transport routes that go to Mater Dei.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.3.6.1	White Paper for School Opening Hours and Traffic Congestion 2015			
394	Chapter 2 Public Transport Measure 2.3.6.1	Ministry for Education & Employment, MEDE, Feedback on White Paper for School Opening Hours and Traffic Congestion 2015	30/06/2016	A substantial number (51.3%) feel that there is a need for a more efficient general transport system with several recommendations for the introduction of fly-overs; for the construction of an underground system and for smaller roundabouts.	Comment noted. Measure 2.3.8.1 addresses the studying of Mass Rapid Transit Systems. In addition, Measure 2.2.7.1 addresses the removal of traffic bottlenecks on strategic roads along the TEN-T Network.
395	Chapter 2 Public Transport Measure 2.3.6.1	Ministry for Education & Employment, MEDE, Feedback on White Paper for School Opening Hours and Traffic Congestion 2015	30/06/2016	16.8% expressed concerns about the problems caused by refuse collection times and several proposals recommended restricted hours for the use of heavy vehicles; delivery trucks as well as horses and karozzini.	Comment noted. Better management of road cleaning and refuse collection are addressed under Measure 2.2.11.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
396	Chapter 2 Public Transport Measure 2.3.6.1	Ministry for Education & Employment, MEDE, Feedback on White Paper for School Opening Hours and Traffic Congestion 2015	30/06/2016	Other issues include the extension of bicycle lanes and the introduction of 'walking' lanes. Almost 6% called for reduced Public Transport rates for workers and there were calls for reduced licence fees for motorcycles and a call for a reduction in car ownership rates.	Comment noted. These proposals have been addressed under Objective 2.2.2 and accompanying measures.
397	Chapter 2 Public Transport Measure 2.3.6.1	Ministry for Education & Employment, MEDE, Feedback on White Paper for School Opening Hours and Traffic Congestion 2015	30/06/2016	2.5% feel that public services hours of work should be revised. Respondents recommend stricter enforcement (16%) and one individual recommended some restrictions on the number of vehicles using roads at any one time.	Comment noted.
398	Chapter 2 Public Transport Measure 2.3.6.1.	Martin Bugeja	02/07/2016	Proposal to have a free transport service for school students irrespective of schools they attend so as to reduce traffic on the roads as in summer.	Comment noted. This has been addressed under Measure 2.3.6.1.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
399	Chapter 2 Public Transport Measure 2.3.6.1	Ministry for Education & Employment, MEDE, Feedback on White Paper for School Opening Hours and Traffic Congestion 2015	30/06/2016	From feedback received it is obvious that there is a problem with traffic congestion but it is equally clear that respondents do not believe that school opening hours are the major cause of such traffic congestion. Traffic jams occur throughout the year, even during school holidays. In fact 81% do not believe that that school hours should be changed whilst most of the 16.8% who sent in proposals advocating a change in school hours feel, that the closing time should be prolonged rather than having an earlier start to school days. 9.2% of the feedback proposed the start of schools at varying times. 3.4% actually proposed a longer school day. An analysis of the feedback received shows that respondents are well aware that there is no single solution to the elimination of traffic congestion. On Education related issues a vast majority are convinced that earlier school opening hours would be detrimental to children. Many feel that school hours should be extended to incorporate catechism classes.	Comment noted.
400	Chapter 2 Public Transport Measure 2.3.6.1.	Karen M. Zammit Manduca	19/07/2016	<p>'O' level and 'A' level exams are all split up into various papers, some of which require a very short time. For example, the Spanish 'O' level exam requires that candidates attend for an oral session (10 mins + some waiting time), a listening comprehension paper (45 mins), Paper 1 (1 hr 5 mins) and Paper 2 (2 hrs).</p> <p>Were the shorter, written papers to be taken on the same day, one following another with, perhaps, a short break in between, it will already halve the travel necessary to sit for the two papers.</p> <p>A little coordination regarding (especially morning) starting times will also help. A 1 hr 5 mins paper need not start at 9am, as this means that there are many more people on the road during the morning rush hour on exam days. A short exam can start later, serving to spread the traffic load (irrespective of whether it is by private or Public Transport) over more time. It is possible that students will arrive for their exams in a</p>	Comment noted. This could be examined within the context of Measure 2.3.6.1 and this suggestion will be forwarded to the competent authority (Ministry for Education and Employment).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				calmer state of mind, rather than worry about the delays caused by traffic gridlock.	
401	Chapter 2 Public Transport Objective 2.3.7	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Needs to be made hand-in-hand between all stakeholders involved and not simply be blamed on the private operators whereby lack of enforcement could be leading to lack of access by private operators resulting in cluttering during peak activity and there may be practical improvements that can be put forward by the operators that are easy to implement but are resulting in challenges to the operation. It transpires that the introduction of the Hop-On Hop-Off Buses were not included in the study since they were not in operation when the study commenced. Perhaps it is time to have an analysis of their presence to better understand how they can be better regulated to support them as well as to ensure that they cause less and less conflict and repercussions to other operations.	Comment noted.
402	Chapter 2 Public Transport Measure 2.3.7.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal as long as the proposed time slots take into considerations arrangements already in existence such as time windows for commercial vehicles to enter Valletta, St Julians (Paceville) and Rabat Gozo. Some of these systems should be retained and potentially extended to other major commercial and tourist areas such as Sliema, three Cities, Mosta, Hamrun, Paola, Mellieha and St Paul's Bay.	Comment noted.
403	Chapter 2 Public Transport Objective 2.3.8	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	The inclusion of private collective transport for off-peak maximisation of their service is necessary as the resources are available.	Comment noted. Please refer to previous comment under Section 2.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
404	Chapter 2 Public Transport Measure 2.3.8.1	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	The challenge is significant and there should be no illusions as to easy solutions to its resolution – even any form of rapid transit proposal, for example, will have catchment limitations, require long-term deployment and necessitate parallel measures, covered in the strategy to have significant effect.	Comment noted.
405	Chapter 2 Public Transport Measure 2.3.8.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	Mass Rapid Transit (MRT) is a long term solution for the traffic problems that have arisen on the islands in the last twenty years. Nevertheless, proper feasibility studies are required and it is essential that before 2025, a decision is taken on the way forward on whether the country wishes to move ahead with an LRT system, improve the current bus system or move towards a metro/underground operation. Other major European urban centres are moving towards a mix of the three MRT systems. Given that the country is pretty much an urban agglomeration especially towards the centre and the eastern coast of Malta, such systems could become potentially feasible in the medium to long term. Nevertheless, before pronouncing itself on such major projects the Chamber wishes to see an initial study which estimates the cost benefit analysis and general impact on the economy and society at large through the introduction of any new MRT system.	Comment noted.
406	Chapter 2 Public Transport Measure	Gozo Regional Committee (GRC)	05/08/2016	Transport Malta shall consider a METRO network that links the main urban areas of Malta and Victoria (Gozo). It is of utmost importance that a future Gozo/Malta tunnel link is extended to strategic areas such as Valletta, Sliema, Mater Dei, the Airport and other areas.	Measure 2.3.8.1 aims to continue the optional analysis as part of a more technical and financial feasibility study.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.3.8.1				
407	Chapter 2 Public Transport Measure 2.3.8.1	Matthew Caruana	26/06/2016	Consider the option to introduce tram services a couple of locations such as Valletta, Sliema.	Comment noted. This has been addressed under Measure 2.3.8.1
408	Chapter 2 Public Transport Measure 2.3.8.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	Early results are very encouraging in the area of DRT systems. Muscat, A. (2012) Demand Responsive Public Transport Systems: An Alternative to the Private Car? Presented at the National Conference Sustainable Mobility in Malta: Transport Research in Practice, Malta 30 November. http://www.um.edu.mt/__data/assets/pdf_file/0007/175147/adrianmu_scatppt.pdf See also http://www.um.edu.mt/University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)/projects/demandresponsivetransport http://www.um.edu.mt/__data/assets/pdf_file/0007/175147/adrianmu_scatppt.pdf Prof. Adrian Muscat and Prof. Maria Attard are currently leading this project.	Comment noted. The document has been revised to reference this local research.
409	Chapter 2 Public Transport Measure 2.3.8.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
410	Chapter 2 Intermodal Objective 2.4.1	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	The integrated journey planner options would definitely help users in finding their way through the use of various collective methods of transport. This would put forward the use of other alternate forms of transport with which commuters are not savvy. Improvements referred in section 2.4.2 are important to support the shift and availability. Private collective transport options would need to also be accessible and incentivised for fair competition and optimum possibilities.	Comment noted.
411	Chapter 2 Intermodal Measure 2.4.1.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
412	Chapter 2 Intermodal Measure 2.4.1.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	<p>Multi-modal journey planners have been superseded by smart phone, up to date, operator or citizen driven apps, which have been providing such information. The UK's transport journey planner (transportdirect) closed a few years ago after it couldn't keep up with the updating of information when compared to citizen driven apps, and other apps which provide similar and real time information. Multi-modal journey planners are very costly to keep.</p> <p>In our case MPT needs to convince Gozo Ferries, water taxis and MIA to integrate their information in the Tallinja App. And it is not a difficult thing to do, at all.</p> <p>Some early research outputs from the VaTIS project can be found in this recent and forthcoming publications:</p> <p><i>Dingli, A., Attard, M. (2016) The Valletta Travel Information Service. Journal of Digital Landscape Architecture. Vol. 1 pp243-253.</i></p> <p><i>Attard, M. Haklay, M., Capineri, C. (2016) The potential of Volunteered Geographic Information (VGI) in future transport systems. Urban</i></p>	<p>New developments such as apps on smart phones are also considered to be multi modal journey planners:- whether in an application format or on a website. The multi modal journey planner need not necessarily be developed by Government, but could also be citizen driven or a private initiative bringing different operators together.</p> <p>In addition, a priority action within the EU Directive on Intelligent Transport Systems relate to the provision of an EU-wide multi-modal travel information system.</p>

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<i>Planning. Vol. 1(4)</i>	
413	Chapter 2 Intermodal Measure 2.4.1.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal. The new 'Tal-Linja' application is once such positive development.	Comment noted.
414	Chapter 2 Intermodal Objective 2.4.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	Surveys are required to better understand the harbour ferry statistics, and whether these trips are taken from the car or the bus, whether they are new trips or the percentage of the trips being made by tourists. This is an important piece of research which needs to direct the policy decisions on expanding ferry services.	Comment noted. Such statistics will be gathered as part of the studies under measure 2.2.4.3.
415	Chapter 2 Intermodal Objective 2.4.2.	Bicycle Advocacy Group (BAG)	22/07/2016	The TMMP alludes to poor passenger facilities in the 3 cities area for ferry passengers. This is amplified for bicycle users. BAG would tend to support additional infrastructure that facilitates cyclists in the 3 cities and for instance the removal of cycling restrictions on the Dock One project.	Comment noted. Refer to Measure 2.4.2.1 and 2.2.2.4 which will review the regulatory framework.
416	Chapter 2 Intermodal Objective 2.4.2	George Debono	18/07/2016	Patronage increasing rapidly (2013 – 2015!) Tunnel ? Viable ? Even if only a small proportion of car users opt for the ferry, a reduction of say, as little as 5% of car drivers around the harbour hub area might be expected to exert a significant impact on traffic. The important point in the context of intermodal transport which includes a bicycle is that ferries, lift operators etc., should be encouraged to take on bicycles for free. The possibility of taking bicycles on board buses should be considered. Folding bicycles should be allowed under all circumstances. Charging stations for pedelecs are a good idea but this should not	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				normally be necessary as the battery charge easily covers the typical range in Malta. Furthermore the e-cyclist would have to carry his plug-in charger around.	
417	Chapter 2 Intermodal Measure 2.4.2.1	OPM Energy and Projects - Projects Malta	19/08/2016	Concession model has been considered for the mentioned ferry tunnel between Marsamxett and Grand Harbours and in fact an RFP has been issued by Projects Malta and a preferred bidder has been identified with whom negotiations are ongoing	Comment noted.
418	Chapter 2 Intermodal Measure 2.4.2.1	AX Holdings Ltd.	19/08/2016	Masterplan needs to include Sea Link Projects, which is a concession contract including a ferry service linking Sliema, Lascaris Wharf and the Three Cities passing through a tunnel beneath the City of Valletta.	Comment noted.
419	Chapter 2 Intermodal Measure 2.4.2.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal although the landing place at the Sliema ferry side will present difficulties due to narrow passage that exists currently. The landing place at the Valletta side seems to be apt for this type of development. There is also a clear need to link the ferry service with a mode of transport which will take passengers from the landing place in Valletta to the city centre. So far private initiatives such as the UBS minivan and electric cab have not resulted in high patronage of their services. The Grand harbour ferry seems to be well serviced by the Barrakka Lift which is indeed being privatised.	Comment noted. This measure addresses physical improvements to the infrastructure at the landing places themselves. Pedestrian connectivity to the ferry landing places is addressed in Measure 2.4.2.4.
420	Chapter 2 Intermodal	OPM Energy and Projects - Projects	16/08/2016	Re mentioned Marsamxetto breakwater, a high level assessment has been commissioned by Projects Malta Ltd which has been completed recently. This will serve as a basis for discussion between public sector	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.4.2.2	Malta		stakeholders.	
421	Chapter 2 Intermodal Measure 2.4.2.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal, extending a breakwater infrastructure in this harbour could also in turn expand the ferry service to other points such as Msida or Ta Xbiex and potentially expand the potential of the Msida Yacht Marina further.	Comment noted.
422	Chapter 2 Intermodal Measure 2.4.2.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal, see comment above.	Comment noted.
423	Chapter 2 Intermodal Measure 2.4.2.3	Daniel Goggi	25/06/2016	In relation to the harbour ferry service, proposals are made to further reinforce the importance of ferry transport. Routes should be expanded to all the harbour. Sliema should be served by at least 3 stops (Tignie, Ferries and The Strand) followed by Gzira/Ta' Xbiex, Msida Creek, Sa Maison (in view of the re-opening in full scale of St. Luke's and Karin Grech Hospitals which are a stone throw's away and facing their own parking problems), and Valletta. Should a tunnel from Marsamxett to the Grand harbour be considered as feasible another ferry route should also be made optional serving Valletta Grand Harbour area (where there is also the Lift to the upper barraka which is closer in proximity to Valletta's core historical and economical centre), Marsa, Isla, Bormla, Birgu and if there is suitable demand Kalkara. Scheme could be piloted during peak hours.	Comment noted. Refer to measure 2.4.2.3.
424	Chapter 2 Intermodal	Malta Chamber of Commerce,	13/07/2016	The Malta Chamber agrees with the proposal, see comment under Measure 2.4.2.1.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.4.2.4	Enterprise and Industry			
425	Chapter 2 Intermodal Measure 2.4.2.5	Daniel Goggi	25/06/2016	Ferries should be accessible to cyclists with their electric or non electric bikes who might need to cycle that one or two kms to make it to their final destination inland.	Comment noted. Cycles are permitted on the ferry service.
426	Chapter 2 Intermodal Measure 2.4.2.5	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
427	Chapter 2 Intermodal Objective 2.4.3	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Various points put forward in this collation of feedback express the need and importance to look at freight and goods-carrying improvements and support to make it more efficient as it is a burden to business as well as to avoid further pressure on the existence traffic. The proposal for a Freight Forum put forward in 2.4.3.2 is welcome as it is essential to have all stakeholders including the private sector around the table to devise methods for improvement since any changes or improvements cannot be done without thorough evaluation and consultation. The effects on business may appear to be minor in any one case but may have greater repercussions in practice.	Comment noted.
428	Chapter 2 Intermodal Measure 2.4.3.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber in principle but the proposal requires further detail and discussions with relevant stakeholders.	Comment noted. Stakeholders will be consulted for this measure.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
429	Chapter 2 Intermodal Measure 2.4.3.1 2.4.3.2	University of Malta - Institute of Climate Change and Sustainable Development (ICCS)	16/08/2016	This is an excellent measure which should be extended to cover all aspects of freight. There is currently little data on freight and virtually no (local) research in the area. A small investment in research (either through the forum or through direct investment in research projects) would go a long way to identify the issues and potential solutions.	Comment noted.
430	Chapter 2 Intermodal Measure 2.4.3.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal, see comment above.	Comment noted. Stakeholders will be consulted for this measure.
431	Chapter 2 Intermodal Measure 2.4.3.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal in principle but seeks to be directly involved in any future discussions.	Comment noted. Stakeholders will be consulted for this measure.
432	Chapter 2 Intermodal Measure 2.4.3.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal – see comment above.	Comment noted.
433	Chapter 2 Internal Maritime Measure 2.5.1.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal but fares should favour (positive discrimination) delivery vehicles which make use of the ferry frequently to deliver a service or good on the sister island.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
434	Chapter 2 Internal Maritime Measure 2.5.1.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal.	Comment noted.
435	Chapter 2 Internal Maritime Measure 2.5.1.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal.	Comment noted.
436	Chapter 2 Internal Maritime Measure 2.5.1.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal, as the full potential of Marsamxett Harbour is underutilised in terms of new potential for economic activities and expansion of current ones.	Comment noted.
437	Chapter 2 Internal Maritime Measure 2.5.2.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal.	Comment noted.
438	Chapter 2 Internal Maritime Measure	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.5.2.2				
439	Chapter 2 Internal Maritime Measure 2.5.2.3	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal.	Comment noted.
440	Chapter 2 Internal Maritime Measure 2.5.3.1	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with this proposal.	Comment noted.
441	Chapter 2 Internal Maritime Measure 2.5.3.2	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees in principal, but the meaning of not meeting the conditions of use of the infrastructure needs to be spelled out better so as to make it clear from the onset on what constitutes such behavior or action.	Comment noted.
442	Chapter 2 Internal Maritime Measure 2.5.4.1.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal but the proposed under sea tunnel between the two islands has to be taken into consideration when reassessing the cost benefit analysis of investing into repairing this infrastructure.	Comment noted. This will be taken into due consideration.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
443	Chapter 2 Internal Maritime Measure 2.5.4.2.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal – see comment above.	Comment noted. This will be taken into due consideration.
444	Chapter 2 Internal Maritime Measure 2.5.4.3.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal – see comment under Measure 2.5.4.1	Comment noted. This will be taken into due consideration.
445	Chapter 2 Internal Maritime Measure 2.5.4.3 2.5.4.5 2.5.1.4	Gozo Regional Committee (GRC)		The Transport masterplan proposes that the Mgarr harbour is to be further extended to meet the increase in demand for port facilities. Some Gozo Regional Committee (GRC) members are of the opinion that the masterplan should seek possible alternative ports in order not to concentrate all in Mgarr Harbour, currently the only harbour in Gozo. The expansion of the Mgarr Harbor as identified in the Gozo & Comino Local (2016) shall be seriously considered. Without port expansion, Gozo’s social and economic advancements are being seriously limited. Therefore, increase in accessibility and the services that can be offered from the harbour shall be given due consideration and importance. One has to consider that with the current increased volume and observed trends over the last years, there is a need for an additional ferry to the three (3) other ferries operated by the Gozo Channel since the demand is exceeding the service capacity currently offered. Moreover, there is no redundancy provision in case one of the ferries is out of service.	Comment noted. These have already been considered. Refer to Measure 2.5.4.3, 2.5.4.5, 2.5.1.4. It should be pointed however, that Mgarr harbour is the only maritime port defined on the TEN-T Comprehensive Network.
446	Chapter 2 Internal	Gozo Regional Committee	05/08/2016	The masterplan should also seriously consider alternative viable berth for the Gozo Channel cargo vessel on the mainland, which will ease the merchandise transport between Malta and Gozo. With the stoppage of	Comment noted. This has been covered in Measure 2.5.4.4.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Maritime Measure 2.5.4.4	(GRC)		the service between Mgarr and Sa Maison, Gozo lost a very convenient service to its haulers.	
447	Chapter 2 Internal Maritime Measure 2.5.4.4	Gozo Regional Committee (GRC)	05/08/2016	The expansion of Mgarr Harbour shall also include provision to provide the necessary service for the transport of cargo (both from Malta as well as directly from other countries). Such investment (in the expansion of Mgarr Harbour) shall not be precluded by the promise of the investment of a permanent link between the Islands since this will take a considerable number of years to materialize.	Comment noted. This has been addressed in Measure 2.5.4.4.
448	Chapter 2 Internal Maritime Measure 2.5.4.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	For the short term the Chamber, agrees with the proposed relocation, nevertheless the proposed link between Malta and Gozo has to be taken into consideration for future assessments of the need for such service.	Comment noted. This will be taken into due consideration.
449	Chapter 2 Internal Maritime Measure 2.5.4.5	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	A study of the requirements of Gozo commuters needs to be made before the decision on an Mgarr–Grand Harbour rapid link is made. Given the fact that Marsamxett provides much better access to Unviersity, Mater Dei, Valletta and the Sliema/St Julians areas, this would appear, at face value to be a better location for ferry termination point within the conurbation area.	Comment noted. Measure 2.5.4.5 has been updated to consider both harbours.
450	Chapter 2 Internal Maritime Measure 2.5.4.5	Gozo Regional Committee (GRC)	05/08/2016	This does not exclude the need to increase accessibility to other destinations in Sicily from Gozo and back through a proper fast sea-link. A fast ferry service between Mgarr Harbour and Grand Harbour should also be a priority.	Comment noted.
451	Chapter 2	Malta	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Internal Maritime Measure 2.5.4.5.	Chamber of Commerce, Enterprise and Industry			
452	Chapter 2 Internal Maritime Measure 2.5.4.6.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
453	Chapter 2 Internal Maritime Objectives 2.5.1 2.5.2 2.5.3 2.5.4	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Suggested improvements for internal maritime operations are to support the overall improvements in terms of the strategy's vision to use combined methods of transport and modal shift intent to reduce dependency on traffic-based single method of transport. Refer to points 15 and 23 above. The infrastructure and availability need to be upgraded in this sense if these modes of transport are to be integrated as a key element in our transport methods offered to the public and businesses, which would be then expected to shift towards them.	Comment noted.
454					
455	Chapter 2 External Maritime Measure 2.6.1.1.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
456	Chapter 2 External Maritime Measure 2.6.1.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Measure 2.6.1.2 suggests accountability in relation to a sector which is so central to the functioning of Malta's economy that would definitely need to have effective monitoring and accountability in terms of satisfactory implementation.	Comment noted.
457	Chapter 2 External Maritime Measure 2.6.1.2.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
458	Chapter 2 External Maritime Measures 2.6.2.1 2.6.2.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	<p>Master Plans for key Port Areas are also welcome as this means that decisions are taken within a context of vision-driven measures. This section shows a number of necessary infrastructural improvements as well as updating our resources and capabilities to reflect upcoming challenges – all very necessary and welcome intentions which need to be laid out in practice.</p> <p>Malta Chamber For Small & Medium Enterprises (GRTU) is represented in both the MSPC and Malta Maritime Forum. Malta Chamber For Small & Medium Enterprises (GRTU) proposes that consultation on this section is put forward with these two committees that bring together the major stakeholders in the sector. Malta Chamber For Small & Medium Enterprises (GRTU) shall put forward its holistic feedback there.</p>	Comment noted. Feedback in support of Measures 2.6.2.1 and Measures 2.6.2.2.
459	Chapter 2 External Maritime	OPM Energy and Projects - MOBC	19/08/2016	Refurbishment and upgrading of Flagstone Wharf and its surroundings, as it affects various users apart from MOBC. Infrastructure of wharf needs to be improved in terms of road surfacing, implement better lighting, maintenance or replacement of fenders and provide proper	Comment noted. This will be addressed by Measure 2.6.2.1.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.6.2.1			servicing of water and electricity access points.	
460	Chapter 2 External Maritime Measure 2.6.2.1.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
461	Chapter 2 External Maritime Measure 2.6.2.1	OPM Energy and Projects - MOBC	19/08/2016	Adequate leading lights to enable usage of berthing facilities on a 24/7 basis for tankers due to the limited the visibility since this gives rise to safety concerns and also in this manner operation can be more efficient with less waiting time wasted and reduction of costs for ship operators.	Comment noted. This will be addressed by Measure 2.6.2.1.
462	Chapter 2 External Maritime Measure 2.6.2.2.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
463	Chapter 2 External Maritime Measure 2.6.3.1.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.
464	Chapter 2 External	Malta Chamber of	13/07/2016	The Malta Chamber agrees with the proposal.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Maritime Measure 2.6.3.2.	Commerce, Enterprise and Industry			
465	Chapter 2 External Maritime Objective 2.6.4	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	16/08/2016	<p>In the Section 2 "REMOVAL OF BOTTLENECKS IN THE TEN-T CORE PORT OF MARSAXLOKK" LNG is only mentioned in the following statement "<i>International developments in shipping such container vessels carrying 20,000 to 22,000 TEU or using LNG as bunkers have not been studied in depth and plans to address these expected future challenges are under development</i>"</p> <p>This statement indicates that there are plans to conduct detailed studies for the development of LNG bunkering infrastructure in Marsaxlokk port. TM may be referring to the LNG bunkering study that SEWCU will conduct. Is this correct or are there other plans from their end (or from Oil Tanking Malta) to conduct such studies?</p>	Comment noted. The TMP refers to the LNG bunkering study that SEWCU will carry out.
466	Chapter 2 External Maritime Objective 2.6.4	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposed measures related to the Marsaxlokk harbour and the Freeport.	Comment noted.
467	Chapter 2 External Maritime Measure 2.6.4.9	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	16/08/2016	<p>In the Section "OIL TERMINAL QUAY DEVELOPMENT" it is mentioned that "<i>With changes in the global fuel and bunkering market expected over the next few years, the terminals handling petroleum products will need to be upgraded or changed (in the case of LNG)</i>"</p> <p>Is this text indicating that Oil Tanking Malta may have plans to develop the oil terminal to handle LNG? Can any official information be indicated especially regarding quay development and storage tanks?</p>	From Feedback provided, we understand that SEWCU is carrying out LNG bunkering studies which we expect would consider all stakeholders interested in such activities. Current fuel storage and bunkers providers clearly have an interest in meeting market demand.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
468	Chapter 2 External Maritime Measure 2.6.5.1 2.6.5.2 2.6.5.3 2.6.5.4.	Malta Chamber of Commerce, Enterprise and Industry	13/07/2016	The Malta Chamber agrees with the proposed measures.	Comment noted.
469	Chapter 2 External Maritime Measure 2.6.6.2	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	16/08/2016	Section 2.6.6.2 ' <i>IMPLEMENT NEW POLLUTION MITIGATION MEASURES</i> ' <i>"As technologies develop and new developments arise in the port areas, measures to limit the environmental impacts can be deployed, this opening up new opportunities to leverage the port use. An example of this would be the implementation of shore supply infrastructures to enable ships that are alongside to connect to the electrical network, power down their auxiliary engines and thus reduce air, sea and noise pollution that would otherwise be generated."</i> TM did carry out a study on the implementation of shore supply infrastructure in the Grand Harbour. Have energy savings been quantified? Are there plans to extend this study to Marsaxlokk Harbour, especially in view of a recent article which appeared on the local media which claimed that shore supply shall be soon available at the Freeport?	Plans for developments of the Port of Marsaxlokk are addressed by Measure 2.6.6.2 and Measure 2.6.2.2.
470	Chapter 2 External Maritime Measure	Ministry for Sustainable Development, the Environment	17/08/2016	Are these new measures which are not included in existing Action plans?	Action Plans developed in the future will take guidance from the Transport Strategy and Master Plan.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.6.6.2.	and Climate change (MSDEC)			
471	Chapter 2 External Maritime Measure 2.6.1 2.6.2 2.6.3 2.6.4 2.6.5 2.6.6	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	In terms of external maritime transport, this section provides ample outlook that proposals are being set within a long-term vision and related goals. This is necessary as in terms of maritime transport Malta has a lot of potential and has traditionally operated this sector in the best possible manner. This sector is crucial for Malta's economy given its geographic position. Resources remain stretched and capacity has become an issue. Improvements set out in this section are tied to long-term planning which is crucial.	Comment noted.
472	Chapter 2 External Maritime Measure 2.6.7.1	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	17/08/2016	Section " <i>DEVELOP AN LNG DEPLOYMENT ACTION PLAN FOR THE TEN-T CORE PORTS</i> " There is no specific reference to the LNG bunkering studies currently being consulted by SEWCU in the statements under this section.	We understand that the LNG Bunkering study has yet to be completed. Therefore were not able to refer to it in this document.
473	Chapter 2 External Maritime Measure 2.6.7.1	OPM (Energy and Projects) - Sustainable Energy and Water Conservation	16/08/2016	S.L 499.12, the Dangerous Cargo Ships, Marine Terminals and Facilities and Bunkering Regulations, limits the entry of volatile fuels into the Grand Harbour. In the draft documents there is no mention of this legal requirement for fuel to be allowed within the Grand Harbour. This issue shall be encountered when the new LNG bunkered cruise liners presently under construction are expected to enter service within the	S.L 499.12 transposes European Directives which we will expect will be updated in due cause.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		Unit (SEWCU)		next few years. This issue is to be addressed both in the 2050 strategy as well as the 2025 Transport Master Plan as this may limit the market.	
474	Chapter 2 External Aviation Measure 2.7.1.1	Users/Residents Safi Aviation Park	04/08/2016	Simulator Training Centre at Medavia Premises: To cater for future training of wide bodied and narrow bodied aircrew space should be allocated landside for new business ventures such as this and EU funding sought to assist investors like Medavia who are considering such ventures.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1.
475	Chapter 2 External Aviation Measure 2.7.1.1 2.7.2.2	Users/Residents Safi Aviation Park	04/08/2016	Currently Medavia have a fueling bowser for the Gulf Helicopters at the top of TWY B to reduce the number of RWY 31/13 crossings/occupancies by Enemed. If further aircraft operators are to use SAP it would be useful to have a more formal set up or fuel farm.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1 and Measure 2.7.2.2.
476	Chapter 2 External Aviation Measure 2.7.1.1 2.7.2.2	Users/Residents Safi Aviation Park	04/08/2016	Compass Rose at SAP to also cater for compass alignment and avoid extended taxi to current compass rose at MIA park 4.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1 and Measure 2.7.2.2.
477	Chapter 2 External Aviation Measure 2.7.1.1	Users/Residents Safi Aviation Park	04/08/2016	Industrial entities also need much greater access landside for spares parts delivery etc... and this should also be considered.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
478	Chapter 2 External Aviation Measure 2.7.1.1	Users/Residents Safi Aviation Park	04/08/2016	Previously a helipad was stationed at the Medavia/AFM premises prior to becoming SAP to allow helicopters to hover taxi to the airport perimeter. Such a facility allowing dispatch would significantly reduce RWY occupancy but may require SAP to raise its security status if this catered for international flights as well as domestic ones.	Comment noted. It is envisaged that possible future helipads and helicopter operations will be considered under Measure 2.7.1.1.
479	Chapter 2 External Aviation Measure 2.7.1.1	Ministry of Tourism (MOT)	26/07/2016	Airport capacity – Malta has 1 airport with a capacity of 5 million passenger movements and which is congested at certain times of the day. What happens in the event it reaches saturation point? Will there be further investment in capacity? Also on the sister island?	Comment noted. This has been addressed in Measure 2.7.1.1.
480	Chapter 2 External Aviation Measure 2.7.1.1	Ministry of Tourism (MOT)	26/07/2016	Logistics/Intermodal transport: Passenger – how adequate is the provision of land transport connections for passengers having their destination in Malta or wishing to continue their travel by another mode e.g. cruise and fly? Does the timing coincide with a seamless connection?	Comment noted. This is addressed by Measure 2.7.1.1. Cruise and fly is not a significant component of airport traffic. However, the tourism aspect will be referred to the competent authority (Ministry of Tourism (MOT)).
481	Chapter 2 External Aviation Measure 2.7.1.1 2.7.2.2	Users/Residents Safi Aviation Park	04/08/2016	Significantly the shipping times for A.O.G consignment and clearance of same and delivery to an operator in the same airport can take longer to transit from arrival/Malta customs to destination than it takes to pack, ship and process from a European supplier.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1 and Measure 2.7.2.2.
482	Chapter 2 External Aviation	Users/Residents Safi Aviation Park	04/08/2016	One of the biggest issues with airport ground traffic is crossing at the traffic lights that control crossing of Runway thresholds 13 and 23 and holds due to aircraft priority.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1., Measure 2.7.7.6 and Measure 2.7.2.2.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.7.1.1 2.7.2.2 2.7.7.6			While this is understandable this has a knock on effect of delaying preparation and dispatch of aircraft not parked on aprons 8 & 9.	
483	Chapter 2 External Aviation Measure 2.7.1.1 2.7.2.2	Users/Residents Safi Aviation Park	04/08/2016	Agreed, however there are considerable archaeological remains in the area and it is vital that a quick response plan is available to remedy any such works stalled due to such issues in a way that all stakeholders' needs are catered for and protected.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1 and Measure 2.7.2.2.
484	Chapter 2 External Aviation Measure 2.7.1.1 2.7.2.2	Users/Residents Safi Aviation Park	04/08/2016	One of the grey areas for some time has been the TWY layout at the extensions to SAP and the new hangar areas. Consideration should be made to the fact that the closure of TWY B or any similar spur TWY could mean significant financial hardship for the operator. Very little feedback exists on MIP's intentions or plan of action.	Comment noted. Improvements to airport operations referred are addressed under Measure 2.7.1.1 and Measure 2.7.2.2.
485	Chapter 2 External Aviation Measure 2.7.1.2	Malta Air Traffic Services Ltd. (MATS)	19/08/2016	While the climb out, approach and any flight path should be kept clear of all obstacles, the respective authorities should acknowledge and respect this importance. These zones, whether in the SPED or not shall be locked and ensured for the continued safety of aircraft landing at / taking off from Malta. While every matter / objective has its importance, one should not forget the importance on the economy that airliners bring to the island, hence obstacles shall not be permitted and flights paths will be kept safe. These include tall trees, high buildings, and other permanent structures.	Comment noted. This has been addressed in Measure 2.7.1.2.
486	Chapter 2 External	Users/Residents Safi	04/08/2016	Will increase ability of MDM (Medavia) aircraft to taxi to park 9 with fewer delays.	Comment noted. Feedback in support of Measure 2.7.2.1

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Aviation Measure 2.7.2.1	Aviation Park			
487	Chapter 2 External Aviation Measure 2.7.2.2	Users/Residents Safi Aviation Park	04/08/2016	Improvements to TWY (Taxiway)'s C, F, G, T, U & W to reduce wide bodied occupancy and access to park 9 via a TWY between TWY F&H. This ignores the need also to consider wide bodied A/C (aircraft) on TWY B due to increased volume at SAP (Safi Air Park)	Comment noted. Feedback in support measure 2.7.2.2. We have also updated the measure to refer to improvements to connections to SAP including Taxiway B.
488	Chapter 2 External Aviation Measure 2.7.2.3 2.7.2.4	Users/Residents Safi Aviation Park	04/08/2016	ILS (Instrument Landing System) & RNAV (Area Navigation System) would enhance MDM operations from RWY (Runway) 23/05	Comment noted. Feedback in support of Measures 2.7.2.3 and 2.7.2.4
489	Chapter 2 External Aviation Measure 2.7.2.4 2.7.4.6	Ministry of Tourism (MOT)	26/07/2016	Where reference is made to terminal charges, there is absolutely no mention of public consultations which are required by EU law to be held. As for the replacement of the ILS, the provision of the ILS is covered through airport charges and thus no further costs should be envisaged.	Comment noted. Legal requirements on public consultation are clear and do not need to be mentioned as part of these measures. The replacement of ILS is addressed in Measure 2.7.2.4 and 2.7.4.6. The Master Plan also includes measures that are envisaged to be funded by the private sector.
490	Chapter 2 External Aviation Measure	Users/Residents Safi Aviation Park	04/08/2016	Often issues of who is responsible for what results in significant delays in service provision, particularly at MIP park interfaces with MIA. Often it is a question of being MIA when it suits MIA and not when it does not. Asset management should extend into SAP and other MIP 'parks' or have complimentary and/or cloned asset management systems.	Comment noted. Feedback in support of Measure 2.7.3.1 and Measure 2.7.3.2

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.7.3.1 2.7.3.2				
491	Chapter 2 External Aviation Measure 2.7.4.1	Users/Residents Safi Aviation Park	04/08/2016	The SSP (State Safety Program) asks for inputs from operators but very little data flows back in the opposite direction.	Comment noted. This will be referred to the competent authority - Civil Aviation Directorate within Transport Malta..
492	Chapter 2 External Aviation Measure 2.7.4.2 2.7.4.3	Users/Residents Safi Aviation Park	04/08/2016	The gates at SAP are not dog proof and on several occasions dogs have been reported to SAP admin as heading down TWY B. In addition, Some areas have duplicate gates (one closed one open) while most industrial parks have rudimentary gates and when these malfunction there is often a delay in repairing them.	Comment noted Feedback in support of Measure 2.7.4.3 and 2.7.4.2.
493	Chapter 2 External Aviation Measure 2.7.4.3	Malta Air Traffic Services Ltd. (MATS)	19/08/2016	While it is understood that fireworks displays are a source of entertainment for the local population as well as for tourists, permits for fireworks displays in the climb out and approach path of all runways shall not be permitted. This would improve safety considerably. In reference to fireworks elsewhere, while NOTAMs (notices to airmen - written notification issued to pilots before a flight) will continue to be issued, provided the appropriate coordination between the police, airport managing body and the air navigation services provider, enforcement should be carried out to ensure that the fireworks' schedules will be respected. In example if the show on an eve of a feast is to be carried out between 2130 and 2300, the show cannot start before or finish beyond the agreed time. Authorities shall assist the airport managing body and the air navigation service provider, in serving every passenger safely.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
494	Chapter 2 External Aviation Measure 2.7.4.3 2.7.4.4	Users/Residents Safi Aviation Park	04/08/2016	Improved ground movement radar and camera control up to the SAP apron would enhance control of the manoeuvring areas and TWY B.	Comment noted. In support of Measure 2.7.4.3 and Measure 2.7.4.4 with specific suggestions.
495	Chapter 2 External Aviation Measure 2.7.4.3 2.7.5.3	Users/Residents Safi Aviation Park	04/08/2016	Add blast fences to outward facing fences to protect aircraft from thrown FOD (Foreign Objects and Debris) at SAP as aircraft are by necessity parked close to the fenced area. In addition, add sound resisting blast fences to SAP and engine run up areas to help reduce noise to Safi and Kirkop residents.	Comment noted. Feedback in support of 2.7.5.3.
496	Chapter 2 External Aviation Measure 2.7.4.4	Users/Residents Safi Aviation Park	04/08/2016	Regulations governing industrial parks such as speed limits often differ from MIA areas, while speeding by AFM vehicles on patrol is a constant problem.	Comment noted. Feedback in support of Measure 2.7.4.4.
497	Chapter 2 External Aviation Measure 2.7.4.5	Users/Residents Safi Aviation Park	04/08/2016	Agreed	Comment noted. Feedback in support of Measures 2.7.4.5
498	Chapter 2 External Aviation	Users/Residents Safi Aviation Park	04/08/2016	Agreed	Comment noted. Feedback in support of Measure 2.7.4.6

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.7.4.6				
499	Chapter 2 External Aviation Measure 2.7.4.7	Users/Residents Safi Aviation Park	04/08/2016	UAV's and Drones are a specific problem of great concern and we have already heard of two cases of near miss incidents with non-transponder equipped drones.	Comment noted. Feedback in support of Measure 2.7.4.7
500	Chapter 2 External Aviation Measure 2.7.4.8	Malta Air Traffic Services Ltd. (MATS)	19/08/2016	While regulations permitting construction include various types of administration, it is very pertinent that enforcement in particular to areas around the airfield takes place regarding dusts and debris. The windy days in Malta are not an exception, and while the visibility during such windy days will decrease due to dust in the air, the same dust will carry debris that will cause damages to the aircraft amounting to thousands of euros, besides the safety and the inconveniences to the passengers and the same operations.	Comment noted.
501	Chapter 2 External Aviation Measure 2.7.5.2	Users/Residents Safi Aviation Park	04/08/2016	There should be a scrappage scheme (as suggested in the D-Air process) to help operators scrap out old polluting and noisy machinery just as one exists for private car owners. Equally when speaking of pollution and emissions extended periods of taxiing, APU use during positioning aircraft, even under tow waste an enormous amount of fuel.	Noted suggested method for implementing Measure 2.7.5.2.
502	Chapter 2 External Aviation Measure 2.7.5.3.	Users/Residents Safi Aviation Park	04/08/2016	To facilitate engine runs, an engine run pen should be created at SAP even if only up to CAT D aircraft.	Comment noted. This is the aim of Measure 2.7.5.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
503	Chapter 2 External Aviation Objective 2.7.7	Gozo Regional Committee (GRC)	05/08/2016	There appears to be consensus among the Gozo Regional Committee (GRC) members that an airstrip will facilitate a fixed wing air link between Malta-Gozo-Malta and possibly to and from neighbouring islands. This proposal has long been on the agenda of various consecutive administration and all the relevant studies were carried out highlighting the viability of such a facility. Gozo Regional Committee (GRC) members now expect that the Government gives this a priority.	Comment noted.
504	Chapter 2 External Aviation Measure 2.7.7.1	Users/Residents Safi Aviation Park	04/08/2016	In some cases existing agreements such as those with Tunisia exclude smaller operators from low capacity commercial routes that would not be viable for the national airline or wide-bodied aircraft. This should be reassessed. For instance Medavia has been precluded from operating into Tunisia with a turboprop operation although there was considerable commercial interest to do so.	Comment noted. Air transport agreements are regulated within the European Policy Framework. Malta strives to achieve the best overall results. Comment referred to competent authority – Civil Aviation Directorate (CAD) within Transport Malta.
505	Chapter 2 External Aviation Measure 2.7.7.1	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	What kind of bilateral agreements are being taken into account? Are Environmental agreements covered by these measures?	The bilateral agreements referred to here are for Air Services Agreements handled by TM CAD and not Environmental Agreements, the latter handled by the competent authority for the environment (Ministry for Sustainable Development, the Environment and Climate change (MSDEC)).
506	Chapter 2 External Aviation Measure 2.7.7.2	Ministry of Tourism (MOT)	26/07/2016	Allocation of slots – the slot coordinator should be independent as required by Regulation 95/93. It should be independent both from the airport and its regulator.	Comment noted. Measure 2.7.7.2 is updated to reflect the slots regulation.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
507	Chapter 2 External Aviation Measure 2.7.7.2	Users/Residents Safi Aviation Park	04/08/2016	This would need to also recognize the need for smaller operators to maintain commercial viability. Often larger operators have greater commercial resilience yet are often favoured when it comes to slot allocations. Often SAP resident operators are cleared away from Park 9 etc. (MIA) parking areas due to space issues while the transit to SAP has a huge financial cost and ignores 'hold point' delays to reduce RWY occupancy by dead aircraft or those taxiing.	Comment noted. Will be referred to the relevant competent authority (Malta Slots Committee)
508	Chapter 2 External Aviation Measure 2.7.7.3.	Users/Residents Safi Aviation Park	04/08/2016	This requires careful consideration of smaller AOC (Air Operator's License) and operator's viability. There is considerable scope for connections to the North African markets.	Comment noted. Air transport agreements are regulated within the European Policy Framework. Malta strives to achieve the best overall results.
509	Chapter 2 External Aviation Measure 2.7.7.5 2.7.7.7	Users/Residents Safi Aviation Park	04/08/2016	A satellite terminal at SAP would enable Malta to cater for domestic passenger traffic to Gozo and private category aircraft, recreational flying and flight schools as well as limited VIP international flights in proximity to MRO's and hangarage facilities most likely to provide for such aircraft.	Comment noted. This is addressed in Measures 2.7.7.5 and 2.7.7.7. However, feasibility studies must be done to determine their possible location.
510	Chapter 2 External Aviation Objectives 2.7.1 2.7.2 2.7.3 2.7.4	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Figures continue to show how crucial it is for Government to secure the interests of our national airline. The section puts forward numerous proposals in relation to the overall improvement for airport facilities to reflect the exigencies that are already stretching the capacity of our present facilities and access to and from them. The proposals show that there is adequate understanding of the most imminent concerns. No one expects that these are implemented according to need without delay as expectations indicate further growth in numbers.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	2.7.5 2.7.6 2.7.7 2.7.8 2.7.9				
511	Chapter 2 External Aviation Measure 2.7.8.1 2.7.8.2	Ministry of Tourism (MOT)	26/07/2016	How adequate is the provision of land transport connections in relation to transshipment and warehousing?	Comment noted. This is addressed by Measure 2.7.8.1 and Measure 2.7.8.2.
512	Chapter 2 Common Objective 2.8.1	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	There is a risk which needs to be considered if funds for transport infrastructure are made solely dependent on transport revenues. Considering that external costs are not tangible and hardly ever considered, the system might become dependent on, for example, more car registrations. Given the cross-sectoral impacts of transport on economy, tourism, retail etc., financing decisions should be guided by national targets and objectives, including climate change obligations. This ties in with the comments raised earlier in the transport strategy on the appraisal models adopted by Government to prioritize programmes and measures.	Comment noted. Measures under Objective 2.8.1 must be seen in the light under measures under Objective 2.2.4 which address the balance of external costs of vehicles across the fleet.
513	Chapter 2 Common Objective 2.8.1	OPM Energy and Projects - Projects Malta	16/08/2016	Re references to road maintenance, upgrading and cleanliness, Government indicated that the public private partnership model was strongly being considered. In fact Projects Malta Ltd has carried out work in this respect, and proposed financial and contractual models are available.	Comment noted.
514	Chapter 2 Common	Malta Chamber For	18/08/2016	Sustainable Financing is needed to ensure that plans and measures being put forward can be actuated and that the necessary upkeep of	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Objective 2.8.1	Small & Medium Enterprises (GRTU)		<p>the infrastructure is maintained. Financing mechanisms such as EFSI and the Government's implementation of Malta Chamber For Small & Medium Enterprises (GRTU)'s proposal for a Development Bank are possibilities for strong capital investment. Earmarking funds specifically for transport and infrastructure beyond the consolidated fund is also positive as this would be far from covering the related expenditure but it would further ensure the importance of this policy area in terms of government agenda.</p> <p>It is important to refer to point on LESA/Enforcement overhaul above</p>	
515	Chapter 2 Common Objective 2.8.1	Ministry for Finance (MFIN)	05/08/2016	Page 19 of the 2025 document mentions an interesting point where OECD's international benchmark is that of allocating at least 1% of national GDP for maintenance, repair, construction, re-construction and operation of transport infrastructure. This percentage is deemed by OECD as best practice and a realistic target to aim for. In Malta, this percentage currently stands at 0.88% of national GDP. There could be scope to increase marginally this percentage so as to be closer to the OECD benchmark. This would also mean that additional funds would need to be made available, or channelled from other expenditures.	Comment noted. This issue is addressed in Operational Objective 2.8.1 on Sustainable Financing.
516	Chapter 2 Common Objective 2.8.1.	Ministry for Finance (MFIN)	05/08/2016	Whilst both documents go into great statistical detail of the history and way forward of transport taxation in Malta, the 2025 document seems to be the more concise of the two. Both documents mention a number of measures related to the TEN-T network for which EU funds will be targeted. This would also mean that Malta will be committing funds as far as MT's co-financing ratio is concerned. Budget Affairs Division would need to be involved to plan for this potential capital outlay should such projects be approved by the Managing Authority and/or the Commission.	Comment noted. Sustainable financing issues are discussed in Operation Objective 2.8.1. The purpose of the Transport Master Plan is to objectively prioritise transport investments in accordance with national, EU and other budgetary allocations that will be made available over the ten-year period.
517	Chapter 2 Common	Kamra Tal-Periti	22/07/2016	"Create Direct Links between revenue generation from transport and transport investment" requires careful investigation, in as far as, it	Revenue generation does not reflect investment in transport at all. Measure

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Measure 2.8.1.2	(Chamber of Architects & Civil Engineers)		needs to be ascertained that such a relationship would not continue to indirectly prioritise policy that generates revenue (e.g. car licensing and in the current oil price scenario, fuel consumption) at the cost of achieving the primary objectives of the strategy (which should be modal shift).	2.8.1.2 proposed that more of the revenue generated from transport is invested in further transport measures which could include primarily sustainable modes of transport.
518	Chapter 2 Common Objective 2.8.2	Ministry for Sustainable Development, the Environment and Climate change (MSDEC)	17/08/2016	<p>As already stated in general comments in Section 2.1.1, the contribution of GHG gas emissions from transport is 44.7 % and not 21.1% of GHG emissions in Malta as at 2011. Ministry for Sustainable Development, the Environment and Climate change (MSDEC) recommends referring to the latest figures.</p> <p>It is pertinent to note that such information already exists in the compilation of Greenhouse Gas Emission Inventory which is submitted on a yearly basis to the EU as well as to the UNFCCC (United Nation Framework Conventions on Climate Change). Moreover, given the lack of data (which is clearly acknowledged in the master plan) the results of such inventory could provide wider use for other purposes.</p> <p>In addition, more clarification is needed as to what kind of measures there are in place in order to reduce the impact of climate change and what are the mitigation factors?</p> <p>A reference to EU and International Obligations must be included in these measures since there are obligatory targets.</p>	Comment noted. This has been amended to read 44.7% in 2014.
519	Chapter 2 Common Objective 2.8.2	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Reduction of traffic, improvement of transport, and shifts towards lower emission transport are evidently integrated in this transport master plan document. Measures towards this end are welcome – however it is the overall measures that look at finding solutions in changing trends and improving systems which are most likely to make the largest impact as compared to measures which are solely intended to address climate change issues.	Comment noted. These notions form part of Guiding Principles 1, 4 and 5 which influence the objectives across the whole Master Plan.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
520	Chapter 2 Common Measure 2.8.2.3	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	This is a very important measure since over all, our planning and decision making process does not take into consideration particular types of risks associated with global environmental changes (or climate change).	Comment noted.
521	Chapter 2 Common Measure 2.8.3.	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	In the issues section there are research gaps which relate to economics, social and environmental research, new technologies, ICT, ITS and so on. The research on road construction and materials is just one area of research is which badly needed. Others however are also necessary. Section 2.8.4 can be integrated with 2.8.3 as road accidents/safety is a broad area of research within transport that cuts across disciplines including, but not limited to engineering, economics, and ICT, engineering, economics and ICT.	This is addressed by Measure 2.8.3.1. In addition, 2.8.4 is a separate discipline to academic research, whilst there is scope for collaboration between transport accident investigation entity and research establishments, Objective 2.8.4 should remain as a standalone objective.
522	Chapter 2 Common Measure 2.8.3.1.	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	Policy or knowledge transfer is a key component of good policy making. The Master Plan and Strategy documents do not reflect on good practice abroad. It is recommended that good practice examples are included where relevant and applicable to support specific measures.	Comment noted.
523	Chapter 2 Common Measure 2.8.3.2	Motor Insurance Association (MIA)	22/07/2016	Technology is rapidly changing the nature of motor vehicles in many different ways, and some of this technology can be exploited to help address many issues relating to traffic on our roads. Following the signature of the Amsterdam Declaration in April 2016 by all EU Transport Ministers the rules and regulations for the use of autonomous vehicles on our roads have been laid down. Many studies	Comment noted. Measure 2.8.3.2 addresses the testing and piloting of innovative technologies.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				have been, and are still being, undertaken to analyse the impact that such vehicles will have on traffic and road safety. It is therefore important that motor insurers are involved and consulted by the authorities in Malta in any future actions taken in relation to this new technology.	
524	Chapter 2 Common Measure 2.8.3.2 2.8.3.5	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Research and Innovation need to bring forward the sector. Investing in latest technologies is a must. Otherwise the pay-off would be negative on a longer term. The private sector should be incentivised and brought on board to contribute its knowledge and expertise as well as data to be able to find the best ways forward for our country in this policy area.	Comment noted. This is the aim of Measure 2.8.3.2. and Measure 2.8.3.5.
525	Chapter 2 Common Measure 2.8.3.3	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)		<p>Section 2.8.3.3 '<i>USE OF TRANSPORT INFRASTRUCTURE FOR ENERGY GENEnvironment and Resources Authority (ERA)TION</i>'</p> <p><i>"Innovation in transport infrastructures has now developed methods of generating and saving energy and these methods should be explored for their potential in the Maltese context."</i></p> <p>In view of the direct relevance to SEWCU's line of work, we would appreciate further information on innovation in transport infrastructure regarding generation and saving energy.</p>	Comment noted. This will be provided in due course.
526	Chapter 2 Common Measure 2.8.3.3	Daniel Cauchi	15/07/2016	Green infrastructure: The use of solar panels to shade walking or cycling paths has been successful used elsewhere for shading. Given Malta's substantial sunshine, as well as the typical excuse of people reluctant to walk/cycle (i.e. that temperatures are high, with few trees along pavements that offer sufficient shade), I fail to see why such projects should not be seriously considered. For example, this can be installed along the Mriehel bypass on the right hand side on the way to Mdina, where it will not interfere with overall aesthetics due to the industrial nature of the area.	Comment noted. This is addressed under Measure 2.8.3.3.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
527	Chapter 2 Common Measure 2.8.3.4	Sandro Zahra	26/06/2016	Proposal to make use of real-time feedback technology to distribute traffic congestion. Google a couple of years back bought an application named Waze, which is world's largest community based traffic and navigation app where drivers can share real-time traffic and road info with drivers, and routes given are updated in real time - all this for free, one has to pay only for mobile data usage. Abroad this is used by almost anyone who drives, (e.g. Taxis in London keep it on all the time). In Malta this app is used by a max of 10 simultaneous users only. One can try to introduce this by reaching an agreement with local mobile operators where they will not charge for Waze related data traffic. Another advantage of this app is that TM will be able to mark closed roads/lanes directly on the app, so that users will be routed through other roads.	Comment noted. This has been addressed in Measure 2.8.3.4.
528	Chapter 2 Common Objective 2.8.4	Malta Chamber For Small & Medium Enterprises (GRTU)	18/08/2016	Safety measures and investigations that would lead to future improvement are welcome. The proposal to integrate systems and units in this sense are also welcome to avoid further bureaucratic procedures and lack of maximisation of resources. With regard to point 2.8.4.2, refer to points 5 and 21 above.	Comment noted. This has been addressed in Measure 2.2.11.6.
529	Chapter 2 Common Measure 2.8.4.1	George Debono	18/07/2016	The protection of vulnerable road users should feature in these sections. This should include the introduction of the "Presumed Liability" element; lobbies are urging its introduction in Scotland but the UK still steadfastly refuses to introduce it.	Comment noted. We will refer this to the relevant competent entity for consideration (Malta Road Safety Council)
530	Chapter 2 Common Measure 2.8.4.1.	Ministry of Tourism (MOT)	26/07/2016	Accident investigation – placing accident investigation functions under 1 authority should not lead to a situation where resources are taken up for other modes in particular land transport which is more accident-prone.	The purpose of Measure 2.8.4.1. is to strengthen maritime and aviation accident investigation and implement land transport accident investigation which is currently non-existent.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
531	Chapter 2 Common Measure 2.8.4.1	Motor Insurance Association (MIA)	22/07/2016	There are many factors other than driver behaviour that contribute to causing traffic accidents. These include uneven and slippery road surfaces due to bad construction and/or maintenance, badly designed roads and junctions, insufficient or incorrect road signage, insufficient or incorrect street lighting and the absence of traffic control measures such as traffic lights and pedestrian crossings. The MIA possesses a great deal of data relating to traffic accidents in Malta and is willing to offer its cooperation and support to TM or any other organisation in order to identify these problems so that they can be adequately addressed.	Comment noted. Suggestion will be discussed internally within TM.
532	Chapter 2 Common Measure 2.8.4.1.	Marine Safety Investigation Unit	04/08/2016	Detailed comment in support of Transport Accident Investigation Entity to provide "no blame" analysis of transport accidents allowing policy development to improve transport safety. MSIU consider that a multi-modal entity would be an effective approach to bettering maritime and aviation transport accident investigations and starting land transport investigations in Malta.	Comment noted. Feedback in support of Measure 2.8.4.1
533	Chapter 2 Common Measure 2.8.4.1	Motor Insurance Association (MIA)	22/07/2016	The MIA feels that it is of great importance that the causes of accidents that result in fatalities or serious injuries are fully investigated and identified, as many of these cases end up in our courts, both criminal and civil. There is therefore a need for the setting up of a Forensic Traffic Accident Investigation Unit to be set up that is resources with not only fully trained and qualified personnel, but also with modern equipment that can access and analyse data contained in the vehicle's on-board computers. The necessary legal framework must be created to ensure that the reports drawn up by such a unit are acknowledged and accepted by our courts and are made available to insurers and lawyers who may be involved in negotiating the settlement of motor insurance claims.	Comment noted. This is addressed in Measure 2.8.4.1.
534	General Comment	Kamra Tal-Periti	22/07/2016	The two documents highlight, amongst other considerations: a) The importance of transport to the economic, social and	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
		(Chamber of Architects & Civil Engineers)		<p>environmental sustainability of the Maltese islands;</p> <p>b) The importance of giving due consideration to hidden costs (the external costs of transport) when assessing national investment priorities and decisions;</p> <p>c) The importance of the integration of transport and land use policy as well as a recognition, in this regard, that incremental changes can have effects that are comparable, if not greater, to those of single major projects;</p> <p>d) The complexity of transport policy and the importance of a coherent, integrated approach to sectoral policies that have a spatial impact. It is clear that the successful implementation of the Strategy and Masterplan needs wide government support and cannot be undertaken by Transport Malta alone without a coherent approach to government policy that recognises the spatial impact of spatial and non-spatial policy and prioritisation of the achievement of the key objectives of the Strategy;</p> <p>e) The need for unpopular decisions to be taken;</p> <p>f) The importance of a long-term education campaign at all levels [including of government itself] to communicate the value of change and the cost of current travel behaviour patterns.</p>	
535	General comment	Aimee Borda	09/08/2016	I think a government should take a hard stance to phase out cars in Malta 1) hiking taxing on cars 2) require a toll road for parking 3) create bike (or motorcycle parking spaces) 4) increase fines and enforcement for reckless driving - essentially making a car a luxury and not a necessity	Comment noted.
536	General Comment	Kamra Tal-Periti (Chamber of Architects & Civil Engineers)	22/07/2016	Last but not least, a commitment to modal shift should also be represented by a change in TM's logo that makes a clear commitment to walking and cycling as key travel modes alongside other forms of road transport and marine and air transport.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
537	General Comment	Motor Insurance Association (MIA)	22/07/2016	<p>The MIA supports all other measures that are aimed at reducing congestion on our roads such as:</p> <ul style="list-style-type: none"> a. The introduction of rapid mass transport systems (such as rail transport systems) b. Free transport for school children in peak times c. Fiscal incentives to employers to encourage employees to work from home and possible travel to and from their place of work at times other than peak times. <p>The MIA confirms its willingness to provide its assistance support on the many initiatives proposed in the Masterplan, whenever this is may be required.</p>	Comment noted.
538	General Comment	Aimee Borda	09/08/2016	<p>The culture of cars is also having a direct impact on our sense of community as we are no longer running into old acquaintances and would not stop in case of emergency (unlike if you are walking by). Therefore, the local governments should really be pushed to rebuild communities: (1) An idea could be like recreational sports tournaments e.g. tag rugby where friends/offices can compete against (this happens in Dublin). (2) public football grounds and schools yards should be open to public (school yards outside school hours) and should be free. People pay taxes for their up keep they should not pay a ridiculous fee again to use them.</p>	Comment noted.
539	General Comment	Ministry of Health (MOH)	22/09/2016	<p>Issues related to transport and public health in Malta include:</p> <ul style="list-style-type: none"> • air quality including GHG • infrastructure facilitating recreation, physical exercise and choice of walking or cycling to everyday activities • safety of all users • noise and vibration • access to services including health care services • liveability and pleasantness of residential areas • bathing water quality 	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				<ul style="list-style-type: none"> • promoting a healthy lifestyle to encourage physical activity <p>All these issues have been included in the NTS and TMP to a greater or lesser extent. The Transport Master Plan 2025 identifies road transport operational objectives to provide alternatives to encourage sustainable travel patterns and reduce private vehicular demand in congested hub areas and to reduce the role of the car in congested hub areas. It recognises that as 50% of trips are of under 15 minutes, there is the opportunity to increase the modal share of cycling and walking whilst ensuring that safety on the roads is always ensured. The measures identified are wide and cover the need for intersectoral working in planning and implementation of measures.</p>	
540	General Comment	Ministry of Health (MOH)	22/09/2016	Maritime and air transport measures should be assessed for health and well-being effects in view of the fact that port and airport areas are very close to residential areas and areas supporting services and activities for vulnerable populations (schools, old people's homes, hospitals, etc).	Comment noted. Mitigation of the effects of seaports and airports on surrounding communities is addressed in Objective 2.6.6 and Objective 2.7.5.
541	General Comment	Ministry of Health (MOH)	22/09/2016	Despite being 2016, the Intelligent Transport Systems (ITS) aimed to improve efficiency and safety on existing road network as outlined in a clear Action Plan for ITS deployment (2013-2017) and named as a strength in the SWOT analysis for present road-based transport has not yet been deployed.	Comment noted. However, this statement is not accurate. A number of components of the ITS Action Plan have been deployed and are continuing to be deployed throughout the Maltese Islands.
542	General Comment	Ministry of Health (MOH)	22/09/2016	Unfortunately, unlike the strategy, the stated principles guiding the Transport Master Plan 2025 do not include public health and safety objectives. However these issues, and measures related to their mitigation, are discussed in the document.	Comment noted. The key principles set out in the Transport Master Plan specifically relate to transport. There have, however, been developed within the framework of the six broader Strategic Goals listed in the National Transport Strategy, 2050. The sixth Strategic Goal is: "Transport to work towards Improved Public Health".

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
543	Specific comment Shopping hours	Matthew Caruana	26/06/2016	Encourage shops to remain open later as to avoid the situation where anyone who needs to run an errand during the week has to do it between 5 and 7.	Comment Noted. However this proposal is beyond the regulatory remit of Transport Malta.
544	Specific comment Taxi licensing	Matthew Caruana	26/06/2016	Make it easier for taxi licenses; Increasing the number of taxis on the road will lower the price of taxis and encouraging people to use taxis instead of their own cars. This will reduce the parking, traffic and pollution as less cars are roaming around trying to find parking	Comment noted.
545	Specific comment Driver Licensing	Joe Bezzina	27/06/2016	Instead of keeping the driving licence age at 18 yrs, I suggest that at age 17 every one should be entitled to obtain a motorbike (125cc motorino) driving licence, of course after doing a driving test. This would probably result in the same individual not opting to immediately obtain a car driving licence at age 18 since the motorbike would be covering the majority of his needs. Needless to say that this would result in less cars on our roads.	Comment noted.
546	Specific comment Driver licensing	Motor Insurance Association (MIA)	22/07/2016	The MIA supports the maintenance of high standards in driving tuition and driver testing, this is particularly required for “C” and “D” type licences.	The minimum requirements for the motor vehicle and motorcycle driver testing and training are regulated at an EU level. Additional testing and training is required for professional drivers of class C and D type licenses through the certification process of professional competence (CPC). Minimum standards for CPC are regulated at an EU level both for the initial testing as well as periodic driver testing.
547	Specific comment Driver	Motor Insurance Association	22/07/2016	The MIA supports stricter controls over elderly drivers with a more structured medical report being introduced that assesses all aspects of the person’s ability to drive safely.	Comment noted. Suggestion will be discussed internally within TM (referred to Land Transport Directorate).

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	licensing	(MIA)			
548	Specific comment Road design	Ivan Zammit	25/06/2016	Proposal to reconsider locating zebra crossings at roundabouts exits. This is not convenient as it requires a driver to stop when one shouldn't be stopping at a roundabout. If necessary the roundabout should be removed and crossroads with synchronised pedestrian lights installed. Examples: Siggiewi, Zebbug and Qormi roundabouts.	In designing roundabouts Transport Malta is required to follow design standards as set out in the Design Manual for Roads and Bridges. Zebra Crossings are required to be located within 50m of the inscribed circle diameter of the roundabout where vehicle speeds are reduced.
549	Specific comment Road Design	Ruben Farrugia	27/06/2016	Tunnel from Cirkewwa to Ta' Qali to help Gozitans minimize their trip	Comment noted.
550	Specific comment Road Design	Paul Debono	27/06/2016	Proposal to remove large roundabouts as these were originally built to deter drivers from speeding. These in fact restrict flow and are useless. Speed cameras are enough. All roundabouts should be reduced to a button.	Large roundabouts are needed to accommodate high volumes of traffic as they have an increased capacity compared with smaller roundabouts.
551	Specific comment Road Design	George Debono	18/07/2016	Making the street environment pedestrian-friendly by giving priority to safety of children, pedestrians and cyclists deserves more attention – and child road safety especially so. Road design innovations as shared spaces barely receive mention (one mention of shared space on page 137 of the Strategy Document). Such concepts as shared space, home zones merit emphasis and possibly an entire dedicated section.	Comment noted. The development of shared space and home zones is now addressed in new Measure 2.2.5.3.
552	Specific comment Vehicle taxes / insurance	Ruben Farrugia	27/06/2016	Higher car road taxes and if one owns another car on his name it must be double road tax, third car trice tax and so on.	Comment noted.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
553	Specific comment Vehicle taxes / insurance	Daniel Cauchi	15/07/2016	Motorists are often burdened with the misconception that roads are maintained through a 'road tax' paid by car drivers. While clearly untrue, this perception is unfortunately prevalent among drivers in Malta, and colours their views and attitudes towards cyclists, often resulting in aggressive behaviour. Clearing up this misconception through the licensing exam would go a long way towards improving these attitudes and increasing mutual respect among road users.	Comment noted.
554	Specific comment Vehicle taxes / insurance	Richard Bugeja	22/07/2016	The effort made to reduce traffic by encouraging the use of Motorcycles is very commendable. Especially with the reduction in 125cc road licence to a fixed €10. But how about those that have bought a 150cc before the change and still have to pay €65 yearly for the first 5years and more as years roll by? It would be quite fair to reduce the licence pro-rata with engine size. Another issue that is very unfair is that cars enjoy a No Claim Discount on their insurance with some insurances giving up to 70% while Motorbikes do not enjoy this benefit. If I never had an accident in 10 years and nearly 100,000km of riding, why is it that I do not enjoy this benefit because I ride a Motorcycle? This is Discriminatory! Plus having a NCD to safeguard will make riders more careful. My suggestion is to reduce Licence fees for all motorbikes according to engine size and to make insurances give NCD for motorbikes just like cars.	Comment noted. The suggestion on motor insurances to motor cycles will be forwarded to the competent relevant authority - Motor Insurance Association (MIA).
555	Specific comment Vehicle taxes / insurance	Motor Insurance Association (MIA)	22/07/2016	MIA supports initiatives that include the vehicle's brake horse power (bhp) in the registration document (log book) as insurers may use this more accurate measure of the vehicle's speed and power as a premium rating factor	Comment noted. This proposal will be discussed within Transport Malta

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
556	Specific comment Conventional fuel vehicles	OPM Energy and Projects - Mediterranean Offshore Bunkering co. Ltd. (MOBC)	19/08/2016	In view of the target to reduce to 0% all conventionally fuelled cars this will lead to a decline in the demand for EN590 diesel product which MOBC stores for its client.	Comment noted.
557	Specific comment Public transport	Ruben Farrugia	27/06/2016	Proposal to introduce free Public Transport	Comment noted.
558	Specific comment Public transport	Karen M. Zammit Manduca	19/07/2016	Public Transport vehicles used in urban areas should be smaller and run more frequent trips, to encourage wider use. In certain residential areas, I frequently see huge buses passing through only every half hour or once an hour, carrying one or two passengers. I am sure that if more 'city buses' (such as those seen in central Florence and central Amsterdam) were used, and passed at much more frequent intervals, it would encourage more use. These types of 'city buses' are low floor and usually take eight persons seated and eight persons standing. One is also able to get onto them comfortably, without the need for bending, as one has to do to enter a minivan, making them more suitable for the elderly and those with impaired mobility. These smaller vehicles would also be better able to pass through narrower, residential core streets than the larger buses, so it would be possible for them to reach more areas of a town or village. It would also possibly mean less of 'getting stuck' and being unable to pass due to obstructions, thereby causing less traffic jams.	Comment noted. Suggestion will be forwarded to Malta Public Transport
559	Specific comment	Paul Debono	27/06/2016	The ideal Public Transport for Malta is smaller, more frequent buses! But, no commercial enterprise can afford this. Busses should revert into	Comment noted.

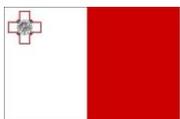
No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Public transport			a public service.	
560	Specific comment Transport equity	Therese Bajada	07/07/2016	The concept of transport equity does not seem to be directly included in the Master Plan. It is partly addressed indirectly, for instance, when reference is made to the Accessible Public Transport Infrastructure Policy, Design Guide. Transport equity helps to address issues for socially disadvantaged groups (amongst which elderly, disabled, and low-income people). If planning and policy-making for the transport system considers equity, all segments of the population would benefit. One measure of equity is accessibility, which should be included in all aspects of transportation, and across all dimensions of its use. It is suggested that a set of guidelines on transport equity are drawn and used in conjunction with the existing and proposed policy documents.	Comment noted. Transport Malta actively tries to make transport policy that is as equitable as possible.
561	Specific comment Transport equity	National Commission for the Promotion of Equality (NCPE)	21/07/2016	The strategy and the plan should recognize that society is composed of diverse groups with different and intersecting identities. The NTS and TMP should strive to take into account the needs and concerns of different groups in society so that Malta's transport system is truly accessible and responsive to the needs of all. Thus, a systematic gender mainstreaming exercise should be carried out in the drafting of the NTS and TMP. Gender mainstreaming is a strategy which seeks to integrate and address the concerns, experiences and aspirations of women, men, girls and boys from different social groups, into any planned action by ensuring that all planning and actions affect all in a positive manner. Gender mainstreaming has been official Government policy since 26 June 2000 (OPM Circular No 24/2000), which policy was reiterated in 2012 (OPM Circular No.15/2012). Thus Ministries, departments and public entities are required to gender mainstream their policies, planned actions and practices.	Comment noted. Gender mainstreaming is already a government policy. Transport Malta actively tries to make transport policy that is as inclusive as possible.
562	Specific comment	National Commission	21/07/2016	The following toolkits can assist the gender mainstreaming exercise for the transport strategy and plan:	Comment noted. Gender mainstreaming is already a government policy. Transport

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Transport equity	for the Promotion of Equality (NCPE)		<ul style="list-style-type: none"> • Checklist on Gender Mainstreaming in Infrastructure Projects http://ncpe.gov.mt/en/Documents/Projects_and_Specific_Initiatives/Gender_Mainstreaming-in_Practise/gmip_checklist_en.pdf • Checklist for Gender Mainstreaming of Government Action http://ncpe.gov.mt/en/Documents/Projects_and_Specific_Initiatives/Gender_Mainstreaming-in_Practise/checklist_gov_action.pdf <p>The mainstreaming exercise should adopt a broad approach to equality by looking at the needs and concerns of different social groups .</p>	Malta actively tries to make transport policy that is as inclusive as possible.
563	Specific comment Transport equity	National Commission for the Promotion of Equality (NCPE)	21/07/2016	Transportation needs, travel behaviour and level of access to transport vary between women and men from different social groups. It is important that there is knowledge of mobility patterns relating to different social groups so that policy can be structured accordingly. needs and barriers experienced by people with different social identities are also linked to how different groups are placed in relation to income, location of residence, caring responsibilities and possession of a driving license, amongst others. Research should be carried out to explore these issues and all data gathered should be disaggregated by sex and age and, where possible, broken down according to different social identities. This also applies to any use and production of data and statistics in the drafting of the NTS and TMP.	Comment noted. Transport Malta actively tries to make transport policy that is as inclusive as possible.
564	Specific comment Transport equity	National Commission for the Promotion of Equality (NCPE)	21/07/2016	There should be gender-balance in the composition of people involved in research, consultation, implementation and monitoring processes relating to the strategy and the plan. People from different social groups should be represented in all these processes at all levels.	Comment noted. Gender mainstreaming is a government policy. Transport Malta actively tries to make transport policy that is as inclusive as possible.
565	Specific comment Transport	National Commission for the	21/07/2016	The policy should strive to increase the number of women working in the transport sector. This is an issue that is also being discussed at EU level.	Comment noted. Gender mainstreaming is a government policy. Transport Malta actively tries to make transport policy that

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	equity	Promotion of Equality (NCPE)			is as inclusive as possible.
566	Specific comment Transport equity	National Commission for the Promotion of Equality (NCPE)	21/07/2016	Ensuring safety should be a priority and safety should also be understood to incorporate protection from discrimination and sexual harassment. It is to be noted that certain groups, such as women, trans persons and people from minority race/ethnic origin and religions many face safety and accessibility issues due to discrimination and sexual harassment. Where relevant, an obligation to have Equality and Sexual Harassment policies should be in place.	Comment noted. Transport Malta actively tries to make transport policy that is as inclusive as possible.
567	Specific comment Transport equity	University of Malta - Institute of Climate Change and Sustainable Development (ICCSA)	16/08/2016	<p>The Strategy and Master Plan do not include a reference to the issues surrounding Transport Equity. It is partly addressed in The Public Transport accessibility design guide however equity is a much broader concept today.</p> <p>Transport equity helps to address issues for socially disadvantaged groups (amongst which elderly, disabled, and low income people) and ensures all sectors of The population benefit from Transport developments.</p> <p>Transport equity Guidelines should be drawn up to support existing and proposed Policy documents.</p> <p>- The Strategy and Master Plan do not include a reference to The issues surrounding Transport Equity. It is partly addressed in The Public Transport accessibility design guide however equity is a much broader concept today.</p> <p>Transport equity helps to address issues for socially disadvantaged groups (amongst which elderly, disabled, and low income people) and ensures all sectors of The population benefit from Transport developments.</p>	Comment noted. Transport Malta actively tries to make transport policy that is as inclusive as possible.

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
				Transport equity Guidelines should be drawn up to support existing and proposed Policy documents.	
568	Specific comment Transport equity	Department of Social Security, Ministry for the Family and Social Solidarity (MFSS)	19/07/2016	The positive impact of the transportation strategy and master plan could be further reinforced through the mainstreaming of social inclusion and transportation equity across all transportation systems, and by highlighting further issues of structural disadvantage that may be created by the transportation system in order to promote greater social justice.	Comment noted. Transport Malta actively tries to make transport policy that is as inclusive as possible.
569	Specific comment Ferry service	Daniel Goggi	25/06/2016	Proposal to consider the pricing of the ferry scheme to make sure it matches or is more affordable than land Public Transport.	The Ferry Fare Structure has been established through a concession contract.
570	Specific comment Air connectivity	Ministry of Tourism (MOT)	26/07/2016	In terms of air connectivity – are the current connections enough for Malta’s needs (taking into account the fact that Malta does not have any land transport connections to other destinations)? Which connections are required for the next ten years? Are there any threats to the provision of certain key connections? What is their contribution to the economy as a whole and what is the impact if particular connections are lost? Any plans to resume inter-island air connectivity to mitigate double insularity?	Comment noted. We will refer this to the competent authority (Ministry of Tourism (MOT))
571	Specific comment Air cargo hub	Ministry of Tourism (MOT)	26/07/2016	There is no mention of the possible development of a cargo hub in the middle of the Mediterranean – this would be a great opportunity for Malta especially given instability in Africa.	Comment noted. This has been studied over many years by various entities. Studies have not resulted in a strong business case for such an activity.
572	Specific comment	Ministry of Tourism	26/07/2016	Possibility of developing an aviation training academy emulating success achieved in other areas is not considered - besides Malta it could	Comment noted. A number of flying schools already successfully operate in

No.	Document Reference	Consultee	Date	Summary of Comments Received	Response
	Aviation training academy	(MOT)		provide training to prospective professionals from other countries most notably African countries in line with ICAO's No Country Left Behind programme.	Malta.
573	Specific comment Airport charges directive	Ministry of Tourism (MOT)	26/07/2016	The Master plan admits that, clear information about operational costs and maintenance as at 2014 is not readily accessible and hinders the ability for Government to direct the prioritisation of airport improvements to ensure that the commercial enterprise remains in line with the national priorities. This may be in breach of the Airport Charges Directive.	Comment noted. The data referred in the Transport Master Plan goes beyond that of the Airport Charges Directive.
574	Specific comment Gozo airstrip	Martin Bugeja	02/07/2016	Proposal to extend the Gozo airstrip by a relatively short distance to benefit tourists and local flying schools.	Comment noted.
575	General Comment	OPM (Energy and Projects) - Sustainable Energy and Water Conservation Unit (SEWCU)	16/08/2016	The document lacks analysis on the effectiveness of current transport policies. There is also no mention of the key indicators being used to assess the impact of the transport policies included therein, such as the vehicle licensing regime, car scrapping scheme, EV-scheme, bicycle schemes, motorcycle licensing regime, etc.	Transport Policy Scenario Testing is being carried out using the transport model in the second part of the development of the Transport Master Plan. This quantifies the impacts of different packages of transport policies and measures in the future year 2025 and compares these with a 'do-minimum scenario'



Operational Programme I – Cohesion Policy 2007-2013
Investing in Competitiveness for a Better Quality of Life
Project part-financed by the European Union
European Regional Development Fund (ERDF)
Co-financing rate: 85% EU Funds; 15% National Funds

