



# NIFS

National Independent Forum for Sustainability

## Alternative Sites proposal for a new University Campus

A discussion document outlining some possible alternative sites  
that may be suitable for a new university campus.

25th May, 2015

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## Rationale

NIFS (New Independent Forum for Sustainability) is a think-tank formed of individuals from a range of professions and walks of life, acting on a voluntary basis and in their private capacity, who share a strong commitment to promoting more responsible approaches to the sustainable enjoyment of non-renewable resources.

We believe that the proposal to create a new university campus, with the right safeguards and by following due process, could lead to an improvement in the quality of life of residents in the region, and could lead to a much-needed injection of investment and activity in areas that have suffered decades of neglect.

Following the recent proposal to build a new university campus on an Outside Development Zone within the very area designated for the National Park between Żonqor and Xgħajra, NIFS discussed the potential impacts of such a development on local communities and the surrounding area. This has led us to write this addendum outlining some possible alternative sites that may be more suitable for such a project. We believe that these alternatives are viable, and if undertaken with a greater sense of vision and responsibility that has been shown to date, could contribute to an improvement in the quality of life to the communities in the area, to our students' guests, and to our heritage, without negatively impacting the environment and taking up of scant land resources in Malta. This document will not go into the merits of the institution itself, or of how it will be operated, nor will it express any opinion on how the contractor was selected, or on other issues of transparency or due process. This document will confine itself to proposing some alternative sites, which should make it abundantly clear that it is unnecessary and capricious to touch any ODZ area for this purpose.

This document is most certainly not a Strategic Environment Assessment, nor should it in any way be misconstrued to replace a Strategic Environment Assessment, but is merely highlighting some of the possible alternatives that could and should be taken into consideration when a Strategic Environment Assessment is undertaken.

## Outside Development Zone (ODZ) and Planning policy

The current public outcry against proposals to build on Outside Development Zone (ODZ) areas, has clearly shown that civil society expects ODZ areas to be respected and safeguarded, and is deeply concerned that Government is not giving adequate reassurances that it will meet these expectations. NIFS considers that it is time Government rises to its responsibilities, as defined in the Constitution, and reassures the public with cast-iron guarantees that ODZ areas will be treated with the respect that this dwindling and non-renewable resource deserves. The inalienable public right of present and future generations to enjoy their landscape and coastline stems from the Constitution of Malta. More specifically, the safeguarding of the landscape and coastline between Xgħajra and Marsaskala is embedded in the current planning policy framework.

The proposal to build a university campus, in whole or in part, within this coastal area is a direct contradiction of these principles and policy objectives, and a travesty of the State's responsibilities under Article 9 the Constitution.

### Constitution of Malta

*'The State shall safeguard the landscape and the historical and artistic patrimony of the Nation.'*

(Article 9, Constitution of Malta)

The countryside and coastline between Xgħajra and Marsaskala is safeguarded by a number of policies in the planning policy framework that is presently in force. Most of the area under discussion is not simply in an Outside Development Zone, but is, in addition, covered by specific policies in the South Malta Local Plan, some of the more salient of which are listed below:

## SMIA 13 National Park

The Policy states:

*“This local plan designates the area known as L-Għassa tal-Munxar (Marsascala) and the coastal stretch between Il-Ponta taz-Żonqor (Marsascala) and Blata l-Bajda (Xgħajra), as indicated in Policy Maps MS1, MS2, XA1 and ZA1, as National Parks primarily for informal recreation (e.g. walking, cycling) and the appreciation of the ecological, geological, archaeological as well as cultural-historical features of these areas. Within these parks priority will be given to the conservation, protection and improvement of the natural and cultural-historical heritage...”*

Further, the Policy also states:

*“These two stretches of coast are important ecological, geological and cultural areas due to the variety of features and elements present in these areas ranging from salt pans to fortifications to a number of important ecological habitats. This policy seeks to maximize the recreational use of the site whilst protecting and providing for the appreciation of the rich heritage of these areas.”*

## SMCO 03: Protection of Areas of Ecological Importance (AEIs) & Sites of Scientific Importance (SSIs)

This AEIs and SSIs identified in this policy include the coastal stretch between Xgħajra, Zabbar and Żonqor Point.

The Policy states:

*“In these protected areas/sites there will be a general presumption against development that would create negative impacts on these areas/ sites and the MEPA will endeavour to safeguard and protect AEIs and SSIs listed within this Local Plan.”*

## SMCO 06: Areas of High Landscape Value (AHLVs)

The AHLVs identified in this policy include the area between Żonqor Point (Marsascula) and Blata l-Bajda (Xgħajra), including the entire area of the Żonqor location under discussion as a site for a new university campus.

The Policy states:

*“MEPA designates the areas identified on the respective Policy Maps as Areas of High Landscape Value (AHLV) as per Section 46 of the Development Planning Act, 1992 and Structure Plan policy RCO There shall be a strong presumption against the creation of new built structures (including cultivation and animal husbandry related structures) in AHLVs.”*

The Policy also states:

*“These areas are essential as local recreational venues for the local populations as well as distinctive local open space lungs which help to impart a feeling of remoteness from the urban atmosphere which is so prevalent in the south of Malta.”*

## Contiguous Protection Areas

In addition to the Policies referred to above, there are a number of complementary policies, which protect areas that are contiguous to the area designated as a National Park in Policy SMIA 13. These include SMC 07: Valley Protection Zones; SMC 04: Archaeologically Sensitive Areas. This creates an opportunity to further integrate and consolidate these various protection measures, by safeguarding contiguous areas around the National Park, extending across tal-Bidni to the Marsaskala road, to act as buffer zones for the Park itself. There are also Policy

## POLICY SOC 12: Use of existing buildings

The guidelines for community and social facilities show that priority is always given to existing or empty buildings. Policy SOC 12 example states :

*Particular consideration will be given to the conversion of underused or empty building, and*

*to the inclusion of student residential facilities, which could be used during college holidays for the accommodation of conference participants.*

Therefore consideration for the sites described below is an obligation of the government, especially when it comes to educational facilities.

## Visual Integrity

Visual integrity of the landscape is an important asset for our quality of life, and that of our visitors. The Maltese cultural landscape is one of Malta's most valuable and irreplaceable assets. It must not only be safeguarded from direct physical impacts, but also from impacts on its visual integrity. The configuration of the area of the National Park (SMIA 13) between Xgħajra, Żonqor, and Fort San Leonardo forms a visual envelope which is almost entirely free of visual intrusions caused by urbanisation. No new constructions outside existing Development Zone boundaries should be contemplated within this viewshed. Stricter height limitation policies, based on visual impact studies, should be introduced to regulate development within the existing Development Zones at Xgħajra and Żonqor.

The concept of visual integrity is highlighted under Structure Plan POLICY RCO 4, which states that *The Planning Authority will not permit the development of any structure or activity, which in the view of the Authority would adversely affect scenic value because it would:*

- 1. Break a presently undisturbed skyline*
- 2. Visually dominate or disrupt its surroundings because of its mass or location*
- 3. Obstruct a pleasant and particularly a panoramic view*
- 4. Adversely affect any element of the visual composition - for example, cause the destruction or deterioration of traditional random stone walls*
- 5. Adversely affect existing trees or shrubs*
- 6. Introduce alien forms, materials, textures, or colours*

The proposal to attempt to integrate a university campus, in whole or in part, within the area designated as a National Park in Policy SMIA 13 is a direct contradiction of this principle of visual integrity, and a travesty of the very purpose of the Park. One should also question as to why the natural park being proposed is actually smaller than that already outlined under the 2006 Local Plan.



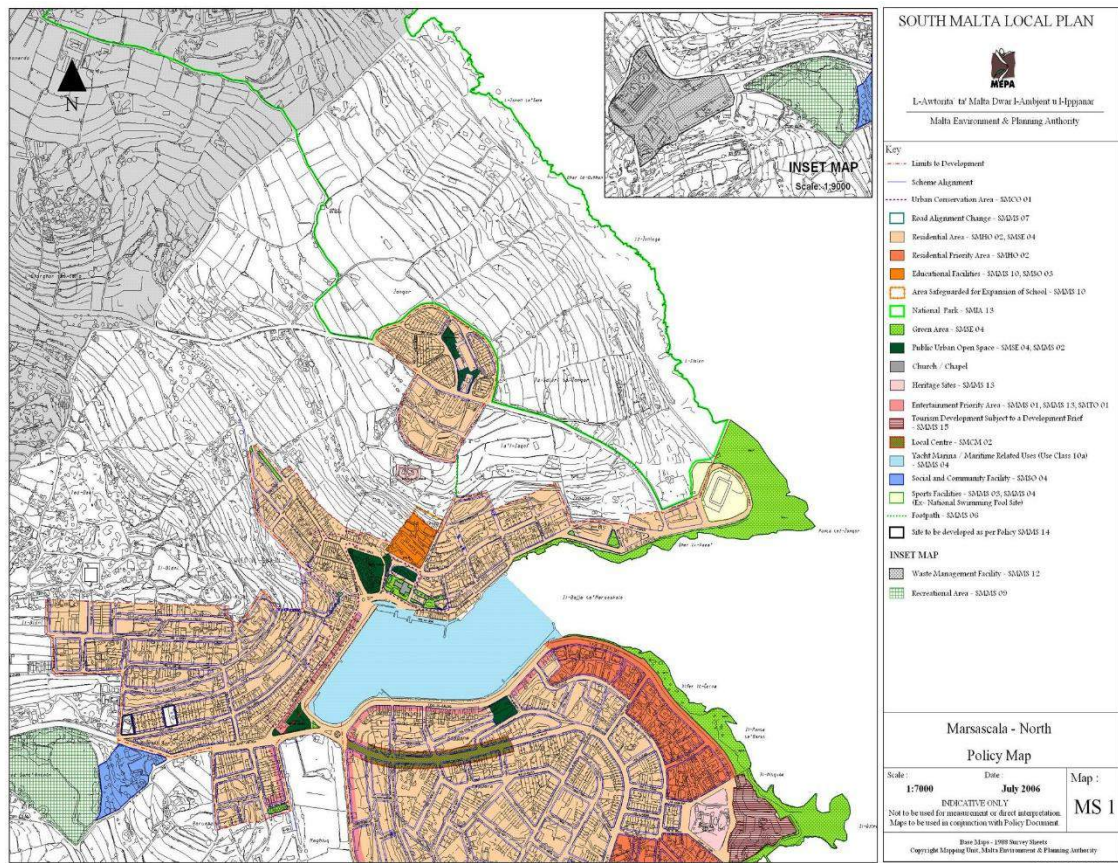


Figure 1: The Local Plan of 2006, outlining the area proposed for the campus as a Park

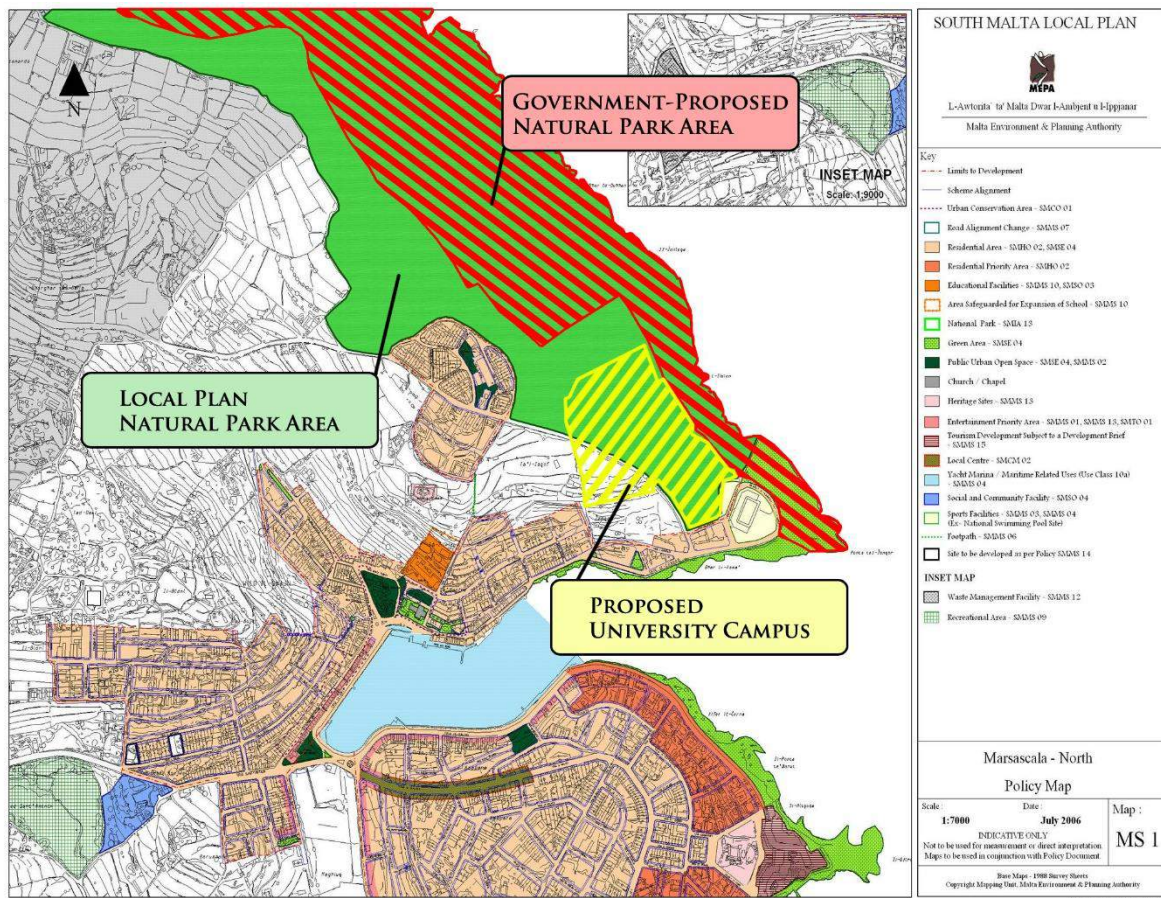


Figure 2: An image overlay, showing proposed campus area and proposed Natural Park, superimposed on Local Plan 2006 park area



## The Local Plan

A Local Plan deals mainly with land-use planning and development issues, and indicates where development can take place, what type and the criteria against which development proposals will be assessed by the Malta Environment and Planning Authority (MEPA). Its main function is to guide development by seeking a sustainable balance between economic and social needs of the public (e.g homes, shops, employment, transport, recreation and community facility requirements) and the need to protect and improve the existing urban and natural environment and to meet future demand in a sustainable manner. The primary thrust of this Plan is to afford protection and secure enhancement of all the assets the area contains, to achieve a more sustainable quality of life and efficient use of land for all sectors.

### Functions of the South Malta local plans

The points below are taken from the South Malta local plan, and serve to highlight some important features.

- *To highlight all areas that require protection from development for social and environmental and other planning reasons.*
- *The rural character of the area is an important feature, which warrants a careful approach to development, particularly since specific infrastructure (Sant' Antnin Plant) and quarrying operations have created adverse impacts on the rural environment.*
- *With regard to the rural and coastal environment the strategy seeks to facilitate the rehabilitation of degraded rural landscapes and the protection and safeguarding of the limited coastal stretch for the provision of recreational facilities.*

The above points therefore illustrate that rural character must be preserved, and that opting for ODZ is most undesirable. The second point above highlights quarrying operations, which are discussed as a third alternative option below.

## Alternative sites proposed – a spread campus

As a group, we believe that the idea of a spread campus and accommodation within the south and the reuse of currently abandoned and/or dilapidated areas in the south would inject economic life across the whole area and not limit it to Marsascala, and could lead to positive social changes across the communities in between if managed properly. Adopting a spread-campus strategy would avoid the need to resort to outside development zone as a campus site, and therefore safeguard the environment and guarantee open spaces for the public to enjoy. If the proposal of an agricultural-ecology park we are suggesting is realised, it would provide even more economic benefit to the communities in the area as both community members and students would have an area of park to enjoy both for recreation and rural landscape enjoyment.

### Utilising existing Fortifications

We propose that one of the alternatives that is given serious consideration is that the proposed campus would be spread out across three fortifications in the area around Kalkara, namely Fort Ricasoli, Fort Saint Rocco and Fort San Salvatore. Here below is a map showing the proximity of these sites, and the usable areas within as provided by Architect Edward Said who is part of our think-thank.



Figure 3: Map showing three viable fortifications in the Kalkara area

## Compatibility of re-use

Adapting a historic site to a new use poses a range of complex challenges, but that is not a reason to shy away from this possibility. The vast military infrastructure that Malta has inherited may only be sustainably maintained if new, and compatible uses are found for these spaces. The reuse of these buildings must be conservation-led, with robust safeguards in place to ensure that not only is the original fabric carefully preserved, but also, that the authenticity, legibility, and sense of place of the whole and its context is fully respected. A thorough and professional Conservation Plan would be required for each of the historic buildings under consideration, which would ensure that their values would be safeguarded. Such a Conservation Plan would therefore need to be undertaken prior to any detailed feasibility or design studies, in order to inform those studies.

## Ownership and Public Access

Ownership of any of the historic sites under consideration must, on principle, never be transferred to private interests. A lease agreement that expires after a definite period, such as 49 years, would need to be defined and negotiated.

Public access to and enjoyment of key areas of the historic sites in question, on the same lines as Fort Saint Elmo, is a principle that would need to be built into the concept and any agreements, and must be guaranteed as an inviolable right throughout the period of use of the said sites.

## Fort Ricasoli – usable area 43, 500 sqm

Fort Ricasoli is the largest fort in the Maltese Islands, built in the 17<sup>th</sup> and 18<sup>th</sup> centuries on top of the peninsula at the entrance of the Grand Harbour opposite Valletta. It follows the outline of the peninsula, and as such as an irregular fort.

Over the centuries it has faced considerable deterioration due to erosion, especially due to its



Figure 4: Fort Ricasoli

outward flanks being so exposed to rough seas. Its maintenance has not been seriously taken up in decades, and at current rates there is a real danger of its total collapse in the coming decades.



*Figure 5: Entrance to Fort Ricasoli*

Fort Ricasoli is currently being used as a storage space and filming area by the film industry in Malta for over 200 days in a year. Its inner flank is also used as a tank cleaning facility for port activities. However little is being done to maintain its structural integrity by any of the current users. Additionally, the Fort itself is rented out at a rate of €40/ day, which is an extremely low rate for an area of this size, and a fort with such potential.

We therefore feel that a fort with an area of this size can be reused for a better purpose as a campus site.

Efforts can be made to find alternative sites for the film industry for storage of their film sets, and an agreement can be reached with the University campus so that certain parts of the campus can be used temporarily for filming. It is also interesting to note that University campus includes an institute of digital filming, which could be an opportunity for increased cooperation with the local film industry.

The tank cleaning facilities, which are regularly used, can be relocated to other areas where they do not pose a threat to health. Currently emissions from the site are posing a threat to the health of people in Kalkara. This can be an opportunity to upgrade the technology used for such an activity to limit toxic emissions.

We believe that Fort Ricasoli, despite its many setbacks, offers an excellent opportunity so that a site facing danger of collapse can be put to better and constant use, so that heritage is restored, while providing a boost to the local economy.

## Fort Saint Rocco – usable area c. 8,500 sqm



Figure 6: Fort Saint Rocco

Fort Saint Rocco is a polygonal fort found on the outskirts of the SmartCity project. This fort, dating back to the time of the French Occupation (end 1700s) as an insurgency fort and later modified by the British, is low-lying, and currently in a state of total abandonment and inaccessible to the public. With a usable area of 8,500 sqm it could be rehabilitated into a faculty or

institute belonging to the University. In addition to this, its close proximity to SmartCity offers an opportunity to cooperate with IT companies setting up shop in the area, and also provides a proximal place for recreation and entertainment.

## Fort San Salvatore – usable area c. 8,500 sqm

Fort San Salvatore was built into San Salvatore Bastion in the 18<sup>th</sup> century to render the structure, which occupies a strategic elevated hill overlooking Birgu, more defensible. The fort can be seen as a retrenchment cut into the piazza or platform of the bastion. Its ramparts are casemated, to the point where the fort can be seen as a hollow work with the ramparts enveloping a central parade ground.

The San Salvatore fort also includes a frescoed chapel which suffered a direct hit during WW2 and is currently in a derelict state.



Figure 7: Fort San Salvatore (Centre)



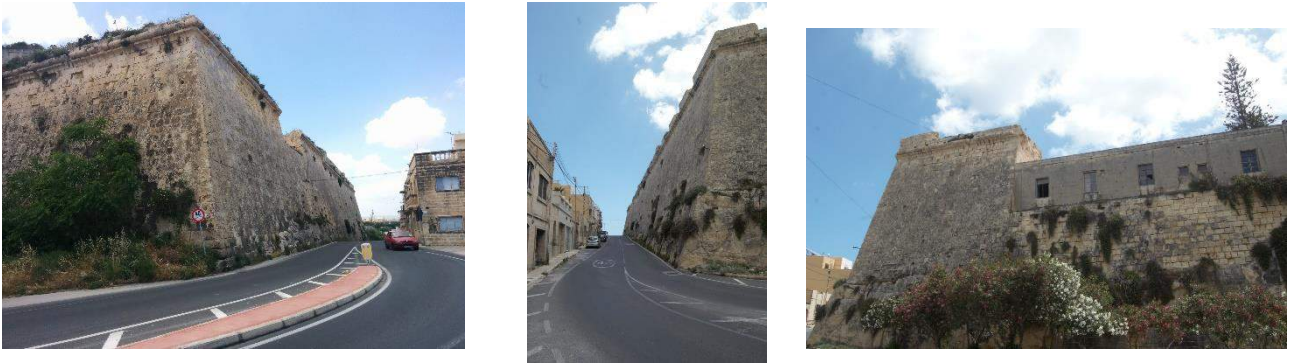


*Figure 8: Fort Salvatore entrance during the British Period*

We feel that San Salvatore Fort would be a third complimentary site of a spread campus around the Kalkara area, and could accommodate another faculty in close proximity to the two other sites briefly described above.

### Infrastructure in the area

When driving in the area, one cannot help but notice the high-quality roads, prepared for Smart City. Most of the roads already have bicycle lanes – indeed a positive, healthy and environmentally sound manner of transportation that should be encouraged in Malta, which is currently ranked as one of the most obese countries in Europe<sup>1</sup>. Students should be offered the opportunity to rent or own bikes. Shuttle buses organised between the three forts could facilitate transport between the campus, and would serve to reduce traffic.



*Figure 9: Roads around San Salvatore (Triq Santa Liberata and Triq San Dwardu)*



*Figure 10: Triq Santu Rokku, leading to both St Rocco and Ricasoli*

## Inner Grand Harbour – another alternative

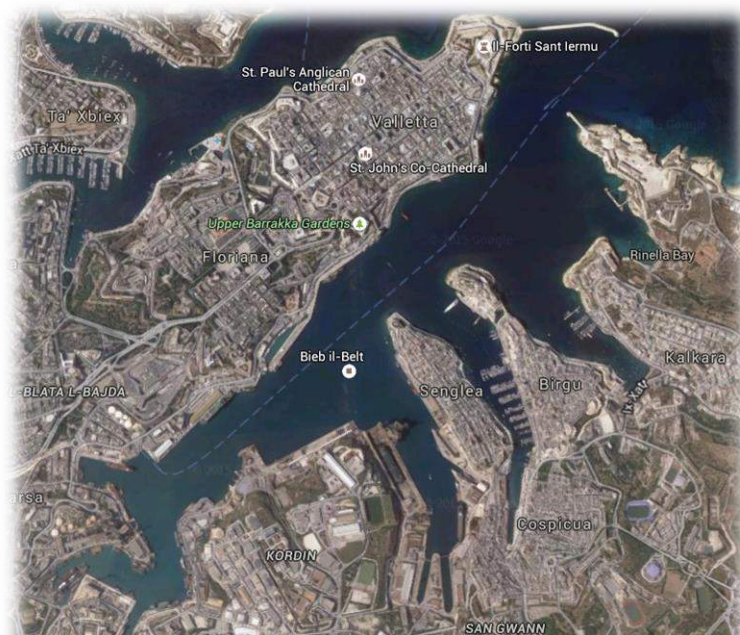


Figure 11: Inner Grand Harbour Area

The inner end of the Grand Harbour is surrounded by large areas that are severely underutilised. The presence of the Marsa Power Station and of other heavy industries, have over the decades resulted in the progressive degradation of this area. This has contributed directly to an impoverishment in the quality of life and wellbeing of the surrounding neighbourhoods.

Within the area itself, the residents that remain are the ones who have no choice; either the very poor, or the residents of the Marsa Open Centre.

The winding down of operations at the Malta Shipbuilding Yard and at the Marsa Power Station have now provided a historic opportunity to reclaim this area for the citizen. The area is crying out for a new vision, which needs to be debated across all sectors of our society, before the country gets to work on its delivery.

We believe that a bold and well-integrated vision can transform this area, in a short space of time, from one of the most depressed and degraded districts in the country, to a highly desirable district that can accommodate a mix of uses that benefit various sectors of society.

The entire shoreline from the area of Il-Menqa, around the Marsa Power Station, and on to the former Malta Shipbuilding site is a superb



Figure 12: Marsa Power Station (blue), Malta Shipbuilding and an unspecified, derelict area (green)



waterfront location, with potential for public waterfront promenades, complemented by maritime leisure activities such as yacht marinas. The surrounding docklands, today largely derelict, present a vast area that, approached creatively and intelligently, may be given a new lease of life, on the model of so many other dockland regeneration projects that have been successfully delivered in other countries. If we succeed in unlocking the vast economic and recreational potential of this area, it will be able to accommodate a mix of uses, ranging from residential, to tourism education, to institutions such as a new university campus. Similar exercises have been carried out abroad. One such example is the King's Cross station complex in London, once a group of derelict industrial buildings, which since then has been rehabilitated into a worthy example of sustainable development, lauded by the public and experts alike<sup>ii</sup>. Surely we can aspire to achieve such an example in our debilitated inner harbour area.

The area has the added advantage of connectivity. It is already very well connected to the arterial road network, and within easy reach of both the capital and the airport. It is furthermore accessible by sea, providing opportunities for water taxis and ferries to further network it into the emerging vision for the rest of the Grand Harbour as a node of leisure and tourism.

We recommend that the siting of the proposed university campus in the inner end of the Grand Harbour be given serious consideration in the context of this vision that also encompasses other complementary uses, while guaranteeing public access to the entire waterfront. We believe that, if managed responsibly and professionally, this initiative may be an important catalyst in the reversal of fortunes of this area, that will help unlock the great potential of this area for the benefit of the South of Malta, and for the country more generally.

## Brownfield sites and Quarries – a third alternative

Our third suggested option would be the use of brown sites or quarries as sites for the campus. One particular site that we have noticed is the quarry, marked in light green in the satellite picture below, which is found in the outskirts of Marsascala, known as Wied iz-Ziju quarries that have been used for generations. It is over 80,000 sqm in size, and is well connected in terms of infrastructure with the Marsascala bypass close by.

We believe that using this quarry site, together with the ruins of the Jerma Hotel as a dormitory, would be an excellent exercise of reusing sites that are currently scars on the landscape or are, in the case of Jerma, a hazard, and utilising them for a better purpose without going beyond the urban footprint of Marsascala. This would also mean that

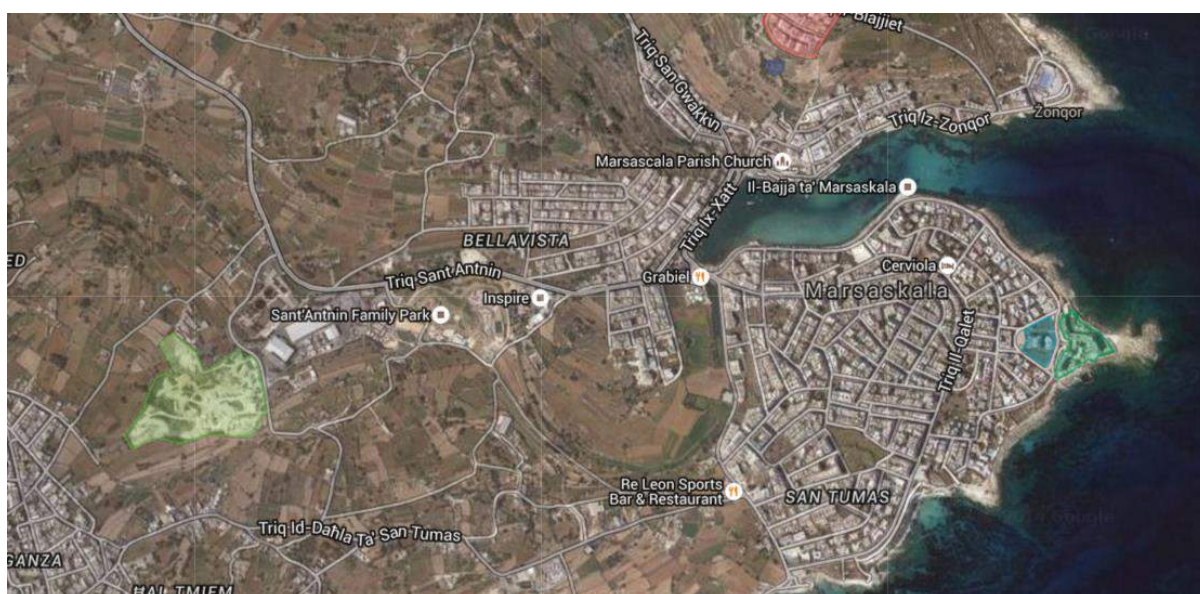


Figure 13: Quarry near Marsascala (light green) and Jerma Palace hotel (blue-green)

Marsascala still gains from the economic side of this project. One still needs to ensure, however, that social impacts of having too many students in Marsascala be considered. A spread across another site (such as Saint Rocco) could still be explored to mitigate the full effects of potentially too many students in one location.



## A Fourth Alternative: The ex-Malta International Airport area at Ħal-Luqa

The site of the ex-Malta International Airport at Luqa is a very large area, with over 120,000 sqm of underutilised or unused space. Currently, it is used only to house some offices belonging to the civil aviation department. The area is located at the centre of the 'South', where the national administration has shown the intention of placing a new university campus. This central location would be of benefit to all the communities of the south. The

economic benefits derived from the students' residence would likewise be for all the communities of the South because it is feasible for different student populations to reside in different villages of the South. The social impact of a large population of foreigners in one locality would be avoided, as the



*Figure 14: Ex-Malta International Airport at Luqa*

number of foreign residents impacts greatly on perceptions and unease of a village community (same concept as the impact of migrants on the communities of Balzan, which houses small numbers, and Birżebbugia, which houses larger numbers).

The main infrastructural utilities of electricity, water and sewage are already in place because they used to cater for the Malta International Airport at Luqa. There is no need for new roads, as it is already well served by main roads.

Close at hand is the Malta International Airport at Gudja, which houses a hotel at Skyparks: foreign lecturers and visiting families can use that hotel facility. The hotel facility itself can be increased in the same ex-Malta International Airport site at Ħal-Luqa and would benefit both the university and the Malta International Airport at Gudja. Additionally in the media it was reported that 2 guesthouses are in the planning stage for neighbouring Gudja and Safi.

It might also be that direct income from lease of land to the developers and future managers of the American University of Malta can be injected into AirMalta itself, facilitating its restructuring.

The finances that the Government of Malta would have needed to use to improve and upgrade the sewage infrastructure and the road system at Marsascala would not be needed if this site is found to be suitable and instead channelled to restoration of the derelict fortifications mentioned above in this document. Their eventual re-use could generate new income for our country.

## Upholding of Sustainability principles and Recommendations

We as a think-tank feel that these recommendations are a viable alternative model as a spread campus, as opposed to the one proposed so far at Żonqor point, and is also a sustainable project upholding all three columns of sustainability – economy, environment and society. We also feel that involving the community in such a project – perhaps through open days upon fort or waterfront restoration, or allowing public access and membership to the private university library and archive would induce a sense of involvement and acceptance within nearby communities, further increasing the sense of ‘welcome’ that the students might expect.

## Recommendations

As a group, we strongly believe that restoration of existing buildings considered for a campus should be carried out applying the following best practice measures during construction and operation:

- A thorough Conservation Plan would be undertaken at the outset for each of the historic buildings under consideration, which would ensure that their values would be safeguarded, by defining a detailed plan for their conservation to the highest standards of current best practice, and that any new uses respect the principles of authenticity, legibility, reversibility and compatibility of use. Such a Conservation Plan would therefore need to be undertaken prior to any detailed feasibility or design studies, in order to inform those studies.

- The ecological value within the footprint and in the immediate vicinity of the building is protected and enhanced and measures are in place for long term management of such features;
- Measures are in place to prevent water pollution during restoration works and when the building is occupied. Sustainable drainage systems (SUDS) should be in place to manage rainwater run-off;
- Potable water consumption is limited through the specification of hydro-efficient fittings and through measures to reuse rain and waste water;
- Energy consumption is limited through the enhancement of existing and new passive design measures, energy efficient systems and renewable energy generation technology in order to limit the additional servicing infrastructure and to reduce carbon dioxide emissions;
- Sources of local air pollution are limited and contained wherever possible, e.g. dust sheets during construction, managed and limited deliveries during construction, no ODP and GWP gases on site, limited NOx emissions, etc.;
- The health and wellbeing of occupants of said buildings is safeguarded through measures that guarantee high levels of air, visual and acoustic quality, thermal comfort, limited Volatile Organic Compounds, adaptable and accessible spaces, as well as early and continuous consultation wherever possible.
  
- Safeguards should be put in place to protect the fabric, sense of place, authenticity and legibility of the historic fabric of an area, so as to ensure that cultural heritage is maintained for future generations.

## Economic perspective

The alternative options of a spread campus makes sense from an economic perspective in that rather than focusing all the campus on one site, one could in effect have accommodation and educational facilities spread across an entire area. Therefore, the students when travelling across the area for their morning and evening commute would see different urban areas and be given the impetus to explore. Economically, this makes more sense, as the wealth would spread across the region. Additionally, it could avoid the dangers of concentrating too much wealth in an area, fostering social inequality.



*Figure 15: A spread campus across this area could benefit all the major urban areas marked on the map, rather than concentrating it in Marsaskala*

This of course is also a considerable injection into the economy of the region, and therefore it could be taken as an opportune moment to locate this campus in the alternative sites being proposed above. The ODZ area causing such controversy, instead, could be turned into the agricultural-ecology park being proposed, of which this document is an addendum.

## Social impact

The social impact of locating the University in an ODZ area at the tip of Żonqor point is also being strongly disputed because, while investment in the region is welcome, locating such a campus in concentrated form has potentially serious social repercussions. Social change in the area is to be encouraged especially since they could be very positive in nature. However, we feel that locating 4,000 students in one area, especially in an ODZ, could potentially lead to a shift in the social fabric of the community that may be unexpected by most its members.

Citing one such example, Paceville has become the entertainment nightlife mecca of the Maltese islands, but the community living there previously has all but vanished as they moved to quieter, more livable places. Should we risk that Marsascala suffers the same as a university campus? Do we, indeed, need two Pacevilles in Malta? Or should we strive to improve and enhance the social vibrancy of a community without overbearing it?

Traffic is an additional problem. Traffic to and from a particular location is set to increase drastically with 4,000 students located in one area, especially with lecturers and visitors travelling to and from the airport and other areas. This could negatively affect the quality of life of many people in Marsascala, and could make an already bad situation (with the Marsa and Fgura traffic bottleneck) even worse. One could argue that this is the opportune moment to start fostering a culture of cycling in this region of Malta, especially since the spread campus would offer a viable opportunity to do so with the roads between the three forts outlined above having low traffic volumes.

We therefore feel that a comprehensive and holistic social impact assessment should be carried out, and alternative site proposals be taken as a primary viable option, where uptake of ODZ land is not considered.

The public outcry against this project through numerous online petitions, setting up of protest groups and eNGO concerns has also led to what we believe should be a serious consideration by the government to truly treat ODZ land as a pact with the people that it would not be touched by large developments, but that its character should be preserved as far as possible. Taking over a stretch of ODZ land as is currently being proposed by the university campus could lead to a loss of faith in the environmental pledges of the government, and loss of faith in the institution of government by many in Malta.



## Conclusion

We therefore conclude this document by stating that the above options show that there are viable and good alternatives for a new university campus. This leads us to recommend that ODZ land is not used for such a development, and that the new university be not located at Žonqor point but in other areas where the infrastructural needs are already existent. We firmly believe that adopting such a strategy for the campus would be for the benefit of all, and could potentially lead to a boost in cultural heritage restoration that safeguards the existence of such structures well into the future.

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<sup>i</sup> <http://www.mcppnet.org/publications/issue12-6.pdf>

<sup>ii</sup> <http://www.theguardian.com/artanddesign/2014/oct/12/regeneration-kings-cross-can-other-developers-repeat-trick>