

## **Reactions to the Strategic Plan for Environment and Development (SPED)**

The following are the reactions of the *Kummissjoni Interdjoċesana Ambjent* (KA) to the SPED document and its supporting SEA (Strategic Environmental Assessment) Environment Report that were issued for public consultation.

### ***An inadequate replacement***

SPED is essentially a continuation/development of a similar document published in 2012. The KA feels that both documents are a far cry from the 1990 Structure Plan (and the process it represented) which they are supposed to replace. SPED fails to be an adequate replacement on three major fronts:

- Unlike the Structure Plan, which was spread over 20 years, SPED's target is the year 2020. This time-frame, considering the long-term changes that planning for sustainable development entails, is rather short to achieve durable results. The impression given is that SPED is attempting to address several micro-issues by proposing changes in policies and legislation. The overall strategy will consequently be hijacked by these micro-issues. A plan characterised by short term fixes (such as proposing land reclamation as a solution to limited land space rather than opting for wiser use of available space) might generate more problems than it purports to resolve.
- Legislation stipulates that SPED needs to provide the information and justification for each of its policies and proposals (parag. 1.10). While the Structure Plan substantiated its policies with official statistical information and surveys, SPED falls short of its basic legal remit – hence the validity of the exercise is questionable. Just to mention one specific example of this failing: while highlighting the vulnerability of Gozo (parag. 2.57), SPED seems to “facilitate” major projects (such as the Cruise Liner Terminal, yacht marina, airfield, reverse osmosis plant) without the appropriate studies to justify them in the first place.
- While the KA commends the extension of the public consultation period for these documents, it feels that more could have been done during this period to actually facilitate public consultation. For example, the SEA document is too technical (and hence inaccessible) for a large part of the public. Nothing was done to sensitise the public on the issues contained in the document – issues that will have a major impact on their quality of life. In other words, instead of waiting for the public to react, SPED should have actively prompted public participation. The published SEA Non-Technical Summary does not even start to address this empowering process. In stark contrast, the Structure Plan had initiated a well-planned and targeted public consultation strategy – the first of its kind in our islands – that allowed various sectors of civil society to voice their concerns.

## ***Data sources***

Considering the importance of the SEA document in the development of SPED, the KA is particularly concerned that “*no primary data was specifically collated for the purposes of this report*” (parag. 4.21). This means that SEA is another in a series of desk-top studies that over these last few years have determined major decisions concerning our wellbeing without bothering to justify and verify the validity of these actions through relevant field data. While succeeding in satisfying the short term goal of reporting obligations, such documents fail to address the real needs and alienate the public from the decision making process. This lack of primary data could have been mitigated to some degree, had it been compensated by an active public consultation process.

As suggested in one of its recent communications<sup>1</sup>, the KA feels that it is imperative that documents of national importance should clearly identify their author/s and the experts/entities consulted during their compilation. This is particularly applicable to desk-top studies. Besides rendering the process more transparent, this measure would alert the public to any possible bias, and would possibly deter certain interest groups (who have access to these fora more than others) from exerting their pressure on policy makers.

## ***Understanding sustainable development***

The KA feels that the essential problem that our country faces when developing and implementing such plans is the thwarted concept of development that pervades policy making – a concept that has been actively promoted by certain interest groups that thrive on their exploitation of our national resources. Consequently, rather than seeing sustainable development as the wise use of resources to ensure our continued economic competitiveness and social development – particularly within the context of a small island state with a high population density – sustainable development is seen as an undesired tether to the whims of so-called ‘developers’.

The KA welcomes SPED’s attempt to clearly distinguish the social dimension when considering socio-economic development – thus avoiding to consider society and economy as if they were the same concept. This decoupling acknowledges the reality that a ‘sound’ economy might mask the ever increasing social gap between those who have and those who have not. A case in point is the financial burden that young couples have to shoulder when purchasing their house to raise a family (parag. 2.9).

Keeping the balance between the pillars of sustainable development (i.e. economy, society, culture and the environment) is a tough act. Past experiences have shown that in most of the major decisions the latter has regularly been sacrificed for the foremost. At this point, the KA reiterates its suggestion<sup>2</sup> of officially extending the remit of the Malta Council for Economic and Social Development (MCESD) to include the

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<sup>1</sup> Kummissjoni Interdjoċesana Ambjent (2014). Reazzjoni tal-Kummissjoni Interdjoċesana Ambjent (KA) għad-Dokumenti li hareġ il-Gvern dwar l-oqsma tal-Ambjent u l-Ippjanar. Arċidjoċesi ta’ Malta, Marsa.

<sup>2</sup> Kummissjoni Interdjoċesana Ambjent (2013). Elezzjoni ġenerali 2013: Rakkomandazzjonijiet dwar għażliet li l-partiti u l-poplu jridu jagħmlu fuq l-ambjent u l-iżvilupp sostenibbli. Kummissjoni Interdjoċesana Ambjent, Kurja tal-Arċisqof.

Kummissjoni Interdjoċesana Ambjent (2013). Pajjiżna ma jiflahx aktar għal żvilupp li mhux sostenibbli. Arċidjoċesi ta’ Malta.

management of environmental resources and sustainable development, hence taking up the role of the defunct National Commission for Sustainable Development (NCSA).

### ***Lack of clear objectives***

By definition objectives need to be specific, measurable, realistic and tangible descriptors of what an initiative will deliver in a specified period of time. Properly worded objectives will serve as criteria against which the success of the initiative can be evaluated. The “objectives” (as well as the “criteria”) listed in SEA’s Table 8: *Environment objectives and environmental criteria* are too vague to be of any value for planning. Consequently, the *Assessment of Alternatives* (Section 7.3), the *Assessment of SPED policies* (Section 7.4), the ensuing analysis, *identification and prioritisation of the major environmental issues emerging from the SPED policies* (Section 7.6) as well as the *Monitoring* (Section 8) are flawed.

The KA feels that by and large everybody would agree with SPED’s list of Thematic Objectives (or rather goals). The solutions to our problems are well known. What SPED lacks is a clear plan of action with clear informed policies, set deadlines and authorities / organizations / individuals responsible for their implementation. In its current state these targets are (as they have been described in the media) just a wish list.

### ***Threats related to land use***

The KA feels that while SPED advocates for a greater care in land use, its analysis of the current situation and proposed actions fail to address the realities of the problem. For example:

- When commenting about the effects of the seven local plans and a number of supplementary planning policies, SPED feels that they have been “*effective to contain urban sprawl*” (parag. 1.3). The reality surrounding us and recent census data<sup>3</sup> tell a different story. Even if one might concede that the horizontal sprawl was reduced, it certainly did not abate the vertical sprawl....and the problems related to it.
- The section dedicated to Land Supply issues (parags. 2.12 - 2.14) clearly highlights that the supply of dwelling units is much greater than the demand (parag. 2.44). The KA therefore fails to see valid reasons justifying the proposed Urban Objective 3.1 that is once again suggesting “*minor adjustments*” to the Development Zone boundaries. The KA had warned against the futility and the dangers of the 2006 exercise to remove ‘*pockets*’ or ‘*infill plots*’ from the existent boundaries as it would create new ‘*pockets*’ or ‘*infill plots*’ that, besides resulting in further land loss, might warrant a similar exercise in the future<sup>4</sup>. This unnecessary depletion of ODZ land was, at the time, heavily criticised by the Opposition. The encroachment on ODZs has, if anything, worsened since then.
- SPED gives various reasons why local land development is anything but sustainable: it threatens biodiversity (parag. 2.23); alters the characteristics of our towns and villages (parags. 2.42, 2.47, 2.52); threatens our cultural heritage (parag. 2.28); wastes our limestone resources (parag. 2.25); generates dust

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<sup>3</sup> The concern about vacant property voiced by several NGOs and the KA itself has been justified [see National Statistics Office (2014) *Census of population and housing 2011: Final report*. Valletta: National Statistics Office]. Census data (based on the situation in 2011) have shown that the “vacant property myth” is not a myth at all ... but a stark reality.

emissions (parag. 2.25); develops problems with our water reserves (parag. 2.47); causes problems related to waste management (parag. 2.25); and has a negative impact on our health (parag. 2.43). The KA cannot understand why, in the light of these reasons, SPED falls short of suggesting tangible and strict policies that control this ‘development’.

The KA agrees with the general principles of the National Spatial Strategy (also proposed in the 2012 document) that propose a *sequential approach* to land use, i.e. (a) *the reuse of existing developed land and buildings (through change of use)*; (b) *re-development of existing developed land and buildings*; and (c) *the use of vacant land* (Section 3.1).

However, the KA would like to show its concern about the proviso made in the same section, namely that the Government may, for projects deemed of national importance, bypass the policies outlined in the plan, as long as it provides a *reasoned decision* that justifies its action. Although this proviso is a development over the condition outlined in the 2012 document, the KA recalls various instances in the distant and not so distant past, when unilateral government decisions (like, to mention a few, the allocation of building plots in the countryside, the siting of interim landfills next to archaeological sites and the development of golf courses) were backed by a lot of justifications that, nevertheless, did not promote the common good ... as was proved over time. The KA feels that no one should bypass a rigorous planning process, not even Government. This, if anything, further highlights the importance of a more rigorous SPED exercise than that adopted for the production of the current document.

### ***Health issues***

The KA commends SPED for highlighting the link between health and the environment in issues related to development. Besides providing the infrastructure needed to respond to symptoms (e.g. waste management solutions), health issues need to eliminate the cause of the problem, i.e. those practices that directly or indirectly reduce the quality of life. Concern about health is essentially the key to understanding that a good quality of life is directly related to a good quality of the environment. KA agrees that local data about environmental health is still noticeably lacking and that there is an urgent need – maybe through dedicated GIS studies – to invest in the collection of this data.

Related to health, the KA notes a serious omission in the SEA. In Section 4.9, dealing with Chemicals, there is absolutely no mention of the marked impact of fireworks highlighted in local research. In fact, the impact of the fireworks industry on the environment is not mentioned anywhere in the document. Paragraph 4.12.1 points out that “*transport emissions, heavy metals in waste and soil, pesticides and fertiliser residues are amongst the main pollutants having a negative effect on human health in Malta*”. However it also claims that “*so far, research has not directly related environmental change to human health effects in Malta. More knowledge is required on sources and effects of environmental health issues in order to address these more systematically and effectively. In particular specific studies on the geographical distribution of particulates by type and their effect on respiratory health, especially that*

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<sup>4</sup> Kummissjoni Ambjent (2006). *Stqarrija dwar it-tibdil fil-konfini tal-iżvilupp*. Kummissjoni Ambjent, Arcidjoċesi ta’ Malta.

*of vulnerable groups, is a matter of priority”* (p.33). This is absolutely incorrect, as local research pertaining to the health hazards related to fireworks residue is available.

### ***Education***

Planning for sustainable development requires a change in our mentality, our lifestyles, the way we define wealth and prosperity and the way that politics is exercised so that the common good, as opposed to the interest of the few, is pursued. This can be mediated through specific education for sustainable development programmes targeting different sectors of society. Although the 1990 Structure Plan had acknowledged (and planned for) this need, SPED fails miserably by not even referring to the important role of education, training and public awareness.

### ***Conclusion***

While acknowledging the need for SPED, the KA feels that the proposed document neither provides the detail required for a holistic strategy regulating the sustainable management of land and sea resources, nor does it reflect the extensive public participation expected in the formulation of similar documents. The KA acknowledges the need to eliminate unnecessary red tape and bureaucratic practices that have hindered sustainable development. However, not all claims for simplification of procedures are honest claims – and SPED should strike a balance between the removal of unnecessary procedures and maintaining (even strengthening) measures that limit the continued proliferation of unsustainable development.

KA urges Government to learn from past experiences and use SPED and any review of planning legislation to remove ambiguous and ill-advised regulations and policies that have allowed individuals and organisations to profit from resultant loopholes. The physical development covered by such regulations and policies irk citizens whose environmental awareness has now extended their definition of social justice (or, should we say, *injustice*) to encompass the reduction of their quality of life due to environmental degradation. Such degradation can result from legalistic arguments arising from ambiguous and ill-advised regulations and policies or through the flagrant disregard of the law. Any policy or regulation, especially strategic documents like SPED, should be especially sensitive for the simple reason that what is written in them will directly affect what happens on the ground. The SPED, in its current version, falls short of guaranteeing a solid step in practising sustainable development at this level.