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OPINION PAPER BY THE INTERDIOCESAN COMMISSION FOR THE ENVIRONMENT ON THE PACEVILLE MASTERPLAN

Over the years, Paceville has become a textbook example of unsustainable development where unrestrained 'development' to generate 'wealth' has had a devastating effect on the living conditions and consequent wellbeing of residents, visitors (especially underage youths with access to inappropriate entertainment establishments) and to some businesses themselves. The writing is on the wall ... for all who care to see and respond appropriately.

To satisfy the need to create wealth for themselves, some entrepreneurs in Paceville have, over the years, managed to develop a predicament requiring millions of euros of public money to rectify. Ironically the proposed Paceville Masterplan seems to imply that the appalling conditions it is supposedly addressing are standalones and not the various related symptoms of a common cause: unsustainable development.

While there is no argument that the situation is in dire need of improvement, one would have imagined that the PA and Government would be wise enough to identify the real cause of the problems, learn from past experiences and ultimately avoid repeating the same mistakes. The document's introduction says it all: "*Achieving this through an integrated approach will support the Planning Authority's aspiration to achieve sustainable economic growth, and in doing so, provide new job opportunities for residents of Paceville and the surrounding areas*".¹

The current residents of the area should therefore have been at the core of the drafting of the plan. The Interdiocesan Commission for the Environment (KA) cannot understand how the concept of an "integrated approach" can be reconciled with a methodology that has failed to acknowledge the importance of actively consulting the residents at the earlier stages of the drafting of the Masterplan. The drafting of the Masterplan should have asked at its inception: who should have the major say in the drafting and whose interests should be actively safeguarded from the same development mentality that originally created the current state of affairs?

Brushing aside the buzz words, such as *sustainable economic growth*, and seeing beyond the smokescreens of colourful artistic impressions, one can clearly see that the Masterplan's target is

¹ <http://www.pa.org.mt/Documents/PacevilleIntegratedDevelopmentFramework.pdf>

once again motivated by unbridled development aimed at maximizing economic gain over and above the wellbeing of residents and the population in general.

The Masterplan states that “*The Government’s ‘Strategic Plan for Environment and Development 2015’ (SPED) aims to significantly increase prosperity across Malta. A key aim is to develop a network of economically dynamic and high quality **livable urban hubs**” (KA emphasis).² The Masterplan again refers to SPED where it states that the latter also focuses specifically on Paceville and explicitly seeks to transform Paceville into an “*attractive, **safe**, efficient and environmentally friendly place*” (KA emphasis).³ The Masterplan goes on to say that “*A clear vision is of key importance as it will help to: add value to Paceville, create a powerful identity for the area, influence perceptions of Paceville, raise expectations of quality and integrity*”.⁴*

In view of the fact that the well-being of the current communities is not central to the drafting of the Masterplan, the KA recommends that the vision and the development objectives in page 76 of the Masterplan should also include:

“to improve the livability of the current communities in Paceville and the surrounding local council areas such as Swieqi, St Julian’s and Pembroke”.

Although reference is made elsewhere in the Masterplan “*to ensure that the resolution of existing issues in Paceville do not lead to overspill impacts on the surrounding communities including Swieqi*”⁵, the KA recommends that the Masterplan has to constantly keep the wellbeing of these present communities in mind. The plan should therefore be revised taking into consideration the concerns expressed by members of these communities.

We call upon the PA and Government to seriously take into consideration the concerns that the relevant local councils and the residents are submitting for the revision of the Masterplan. We appeal to the PA so that when it publishes the comments received, its replies to such submissions are detailed and not dealt with in a cursory manner. The PA has a duty of care to the present local communities.

It is indeed surprising that while there is widespread agreement that a Masterplan is needed for Paceville, some developers still seem to prefer to have a Masterplan which would be flexible enough to allow them to build wherever they see an opportunity, thus rendering a Masterplan useless⁶.

One cannot overlook the fact that during the last years, there has been a proliferation of gentlemen’s clubs in the area. High-quality branding of the area which the Masterplan tries to achieve and so-called “gentlemen’s clubs” just do not go together. Besides, this phenomenon jars with the efforts our country is making to give women the respect and dignity they deserve. Browsing through in-flight magazines on flights to Malta sometimes gives one the impression that Paceville is a red-light district

² *Paceville Malta, Malta’s prime coastal location, Development Framework*, Mott Macdonal & BroadwayMaylan, September 2016.

³ *Ibid.* pg 31

⁴ *Ibid.* pg 75

⁵ *Ibid.* pg 76

⁶ Paceville expropriations must be at right value for residents, *The Sunday Times*, Nov 20 pg 10.

and not an entertainment area for all. **In view of the non-compatibility of the targeted branding and current use, the KA recommends that the Masterplan revisits the current uses of commercial establishments in the area.**

On the issue of land reclamation, which the Masterplan earmarks for the Dragonara coastline, the KA recommends that no land reclamation takes place that may damage the rich marine biodiversity. On the contrary, the Masterplan should introduce proposals that guarantee the protection of such marine biodiversity. Moreover, it is up to us to safeguard the coastline in every aspect, both for the natural and cultural wealth associated with it and because we owe it to our children. Indeed a decision taken in Parliament only six months ago, gives the government full authority to protect the coastline on behalf of present and future generations.

In December 2015, in the wake of Pope Francis' encyclical *Laudato Si'* urging us to give priority to the common good, the KA had published a set of proposals for reflection and action by Maltese citizens and Government so that as a Maltese nation we do our part to care for our common home. The proposals contained three that are relevant to the Paceville Masterplan and if applied, may contribute to the improvement of the wellbeing of Paceville residents:

- 1. “We invite Government to fund a long overdue and truly national study on the demand and supply of Maltese properties and the fiscal and economic environment that has a bearing on them. The terms of reference for such study should be issued for public consultation and enjoy the widest agreement possible by all stakeholders.**

Such a study affects the whole nation and should be treated as such and when finalised should be published entirely. Its implications for planning purposes, the safeguarding of the environment and affordable housing are widespread. This study when completed should be updated regularly and be an important source for the Strategic Plan for Environment and Development (SPED) and the Local Plans. Otherwise, decisions related to the built environment are not going to be informed as they are expected to be especially in the case of a densely-populated country like ours.”

In the context of the Paceville Masterplan, this study assumes a greater importance.

- 2. “We appeal to Government and all authorities to enforce regulations without fear or favour in a just manner with all.**

Unequal enforcement of regulations between enterprises leads to the creation of unjust competition between those who respect environmental and planning regulations and those who are made to feel and think that they are above the law by the behaviour of the authorities”.

Paceville definitely does not need a Masterplan to secure law and order in this part of the island. There is no need for a Masterplan to invest in sound resources that without fear or favour enforce the laws relating to: non-smoking in enclosed public places, refusal of access to underage people in places of entertainment, protecting residential areas from irresponsible revellers who make life hell for residents. These, in turn, have to put up with all sorts of unfortunate incidents including damage to their property.

3. “We appeal to Government to carry out the necessary reforms in how it leases out or disposes of property belonging to the whole nation and to ensure transparency in the granting of environment-related tenders.

Government is the largest landowner in the country and it has to ensure that the property under its stewardship is managed in a way that is transparent and does justice to the whole nation and to future generations...”

Unfortunately, doubts have been publicly expressed in relation to Government granting land in Paceville. Prior to the approval of the revised plan, Government should make it clear who is going to share the costs of implementing the revised Masterplan. One expects that the developments that will benefit from such Masterplan should contribute to a fund that will upgrade the infrastructure and pay for expropriations that will ultimately benefit such developments. In the meantime, the KA appeals to the Government not to take decisions on transfers of property that will compromise the revision of the Masterplan and to seriously consider the concerns of the present communities of Paceville, St Julian's, Swieqi and Pembroke.

In conclusion, while condemning any attempt that may turn this issue into a partisan one at the expense of the true wellbeing of the citizens, the KA feels that this is yet another opportunity to give center stage to sustainable development. Various administrations have plagued Malta with the praxis of putting economic interests above all other considerations and guising them as projects of National importance. In reality, most of these projects benefit a handful of ‘patrons’ while short-changing the common citizen whose voice rarely makes it to the corridors of power. These projects are usually proposed as *fait accompli*. Any public consultation is used as an attempt to “smoothen” the negative impacts of the project rather than to seriously consider its viability.

Malta has, on several occasions, been bold enough to challenge existing paradigms. The task set to revitalise Paceville is one of these challenges. It is an opportunity to challenge the predominant model of development and wealth that puts profit before any consideration of the common good and the wellbeing of communities and their surroundings. It is an opportunity for a regeneration of Paceville that puts sensitivity to social needs, social justice and environmental responsibility as the foundations of economic development. Will we, once again, miss the opportunity?