

Press Release on the proposed complex of shooting ranges at Busbesija, Mosta.

The Interdiocesan Commission for the Environment (KA) is deeply concerned about the proposed complex of shooting ranges on around 70 tumoli of land which include agricultural land at Busbesija, Mosta. The area which is outside development zone (ODZ) is an area of high landscape value as designated in the Central Local Plan. The KA's view is that the use of such land for the proposed project amounts to a substantial negative impact on the Maltese countryside.

The process to grant Government land and the shooting ranges project itself

In 2013 Government issued a call for expression of interest for the conservation and management of land at Busbesija for 45 years. The land includes mainly military huts that were used in World War II. In April of this year, Government announced that following a request for proposals it was granting the area to U-Group Ltd "which plans to develop a shooting range"¹. This is baffling. The public information which is available on the project seems to show that the huts are to be used for facilities **ancillary to** the shooting range. So the land that Government and U-Group are currently negotiating should not be incorporating the shooting range itself but facilities **ancillary to** the shooting range. The area of the huts covers around 5000m² while that of the whole complex of shooting ranges including the huts covers an area of over 70,000m², that is 14 times more than the area covered by the huts.

At this stage it is pertinent to ask the following questions. Is there some kind of commitment to grant a development permit for the shooting ranges project that has been promoted on the developers' website at least for the last months? Does the granting of the huts for purposes ancillary to the shooting range imply that the whole surrounding area is now "committed" and therefore MEPA will oblige and grant the development permit for the shooting ranges complex? Does the complex of shooting ranges require more Government land than that which was issued as part of the Expression of Interest and the Request for Proposals?

Promises and commitments made by political parties

In December 2014 the Parliamentary Secretary for Sports was quoted² as saying that the building of a new shooting range was one of the Government's electoral promises and that Government was committed to completing this project in the next couple of years. He had stated that two potential sites were identified but a final decision had not been made.

¹ The Malta Independent, 16th April 2015

² The Times of Malta, 12th December 2014. The same press article mentioned that this project has to be in place for shooting competition to be held in 2017 for which 3400 shooters are expected to take part. It also mentioned that such project would also promote Malta as an ideal future training destination for shooters from over 130 countries.

The KA is against promises and commitments which are made by political parties when in Opposition or in Government when such promises and commitments first need to be carefully studied due to their environmental impacts and land-use implications. Only after such studies are carried out can a reasoned and informed decision be made by decision-takers. This applies more importantly in cases where site-specific promises and commitments are made.

Such commitments or promises fly in the face of a proper planning process. In any project of a certain size and which would have particular impacts, a diligent, sincere and transparent site selection process has to be carried out which takes into account all environmental constraints including the impacts on people. This site selection process has to be carried out within the context of the applicable environmental and planning laws which include public consultation that is worthy of its name. The granting of public land to individuals or entities has to be totally transparent because this has a bearing on proper environmental governance. Public land belongs to the whole nation and its use should not be compromised by ill-advised promises or commitments.

A national project

The proposed complex of shooting ranges is planned to take place close to Mount St Joseph Retreat House. The complex is being promoted by the interested parties as a national project. But what constitutes a “national project” or a project of “national interest”? Is not Mount St Joseph Retreat House a well-established project of national interest in itself? For the last 50 years, the retreat house, together with its gardens and natural surroundings has been providing an environment where people of all social backgrounds, believers and non-believers, can find space and time to reflect on their life. Does a place which is visited by 10,000 people annually for such a purpose have no relevance to policy-makers?

Mount St Joseph provides a much-needed social service to all. It is not a service provided to the Jesuits. It is a service provided by the Jesuits to the Maltese. It provides affordable breaks of silence for whoever wants to experience such silence. It is so affordable that Mount St Joseph has to be sustained financially by the Jesuit Province. Moreover, its benefits to Maltese society at large can never be quantified in financial terms.

The KA strongly believes that a complex of shooting ranges close to a retreat house cannot but have a negative impact on such a place. The peace and tranquillity that the retreat house environment provides to the Maltese public deserves to be protected. This is not for the sake of the Jesuits but for the sake of the Maltese population. Places in Malta like Mount St Joseph’s environment are very rare and need to be protected.

The nearby residents

Apart from the negative impacts that such a project would have on the thousands of people who make use of the service of the retreat house, one has to definitely take into consideration the impact that such a project would have on a daily basis on the nearby residents of Busbesija and Taż-Żokrija neighbourhoods in Mosta. Some of these residents live a stone’s throw away from the proposed site for the shooting ranges.

It seems that the promoters of the project are not in a position to provide a guarantee to all the nearby residents that they will not be negatively impacted by the project.

Therefore Government and MEPA should adopt the precautionary principle. This means that when there is no real certainty provided by the developers that there will be no negative impacts by a development then policy makers should err on the side of caution.

High-impact sports projects in a country with a high population density

Sometimes the use of land in Malta is treated in a way which assumes that Malta is one of the least densely populated countries in the world. The facts point to the opposite direction. With a population density of 1562 persons per sq.km, Malta is considered to be one of the most densely populated countries in the world. This highlights the importance of adopting a very rigorous planning approach within a proper strategic framework which is worthy of its name. In this context, the Parliamentary approval of the proposed Strategic Plan for the Environment and Development (SPED) should not be sped through. As has been stated by the KA last year, the SPED “is a far cry from the 1990 Structure Plan”³. It is a flawed replacement for the current Structure Plan and needs to be redrafted from scratch. Its current version is going to have a negative impact on current and future generations.

From a strategic point of view, the very concept of high-impact sports facilities like the proposed complex of shooting ranges needs to be carefully assessed as to whether they can, in the first place, be acceptable in such a small country like Malta.

Last year, on a request by Government, MEPA embarked on a process of drawing up a shooting ranges policy. MEPA issued the objectives for such a policy as part of a public consultation. It is somewhat strange that a shooting ranges policy that was approved by MEPA and has been awaiting Government approval for the last nine years, was not referred to at all.

Better use and upgrading of current shooting ranges spread over Malta and Gozo

The KA invites the proponents of the complex of shooting ranges proposed at Busbesija to carry out an exercise on how the current shooting ranges spread over Malta and Gozo can be upgraded to accommodate individually the different components of the proposed complex. In this way, no new ODZ land is sacrificed for this particular sport. To have all these facilities in one place just because there might be an international event in 2017 is not a good-enough reason.

Organisers of international events usually purposefully distribute events in various places so as to distribute and maximise the economic gains of the event over different localities. If this is practical for large countries why shouldn't it be practical for a small country like ours? Moreover, the refurbishment and upgrading of current shooting ranges, instead of a new complex of shooting ranges, is a much more sustainable solution with clear environmental, social and economic gains

The KA considers this exercise as indispensable prior to granting the land at Busbesija for facilities that are ancillary to the complex of shooting ranges. Moreover, MEPA should likewise insist on this exercise when the development permission application is

³ *SPED – A Far Cry from the 1990 Structure Plan*. Press Release dated 24 June 2014 issued as part of the public consultation on SPED

submitted to it to develop private land for the complex of shooting ranges as well as to develop the area covered by the military huts for facilities ancillary to the complex.

A better use for the huts at Busbesija

The KA suggests that prior to Calls for Expressions of Interest for land owned by the State, Government should carry out a public consultation process on what would be the most appropriate uses for such property. This would apply particularly in the case of sites which have not been already earmarked for a specific use in the respective local plan which would already have passed through the phases of public consultation. There may be different ideas, such as a children's creativity centre, that can be appropriate for the site at Busbesija. Only a transparent public consultation process can come up with such ideas that should be worth considering and which are not wholly driven by commercial interests. Following the choice of the best idea on the purpose for the Government-owned site, then sources of funds would be explored, including the use of EU funds.

Attracting foreign investment is a laudable enterprise, but we need to be conscious of the price that we sometimes have to pay in order to attract such investment. In the wake of our celebrations commemorating the 50th anniversary of Malta's Independence, 40 years since Malta became a republic, 35 years since Freedom Day and 10 years since Malta's accession to the EU, we should be more than wary in accepting deals which tend to be neo-feudalistic or neo-colonialist in nature. Land space is a limited commodity in Malta and we (i.e. those who **live** in the country) – not the foreign investor – should determine where and how much space we want to dedicate to the investment. Putting our nation's wellbeing as a top priority may sometimes entail missing out on 'lucrative' deals with short term gains but with long term negative impacts.

Government is still in time to reconsider the decision to grant the huts at Busbesija for facilities ancillary to the complex of shooting ranges. It is also still in time to rethink its support for the proposed development of the complex in this area. Wise decisions that are taken now will prevent an irreversible impact on the countryside later on. The Maltese proverb "*Aħjar Uff milli Aħħ*" is well-suited for such a rethinking.

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