

8<sup>th</sup> November 2019

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## **THE IMPORTANCE OF SOUND PLANNING IN MALTA**

### MESSAGE ON THE OCCASION OF WORLD TOWN PLANNING DAY 2019

Every year, the Interdiocesan Environment Commission (KA) issues a statement on this day to highlight the importance of sound planning for Malta, one of the most densely populated countries in the world. **For such a small country, a planning process which is not hijacked by vested interests is of paramount importance, if the country is to pursue the route to sustainable development for the benefit of both current and future generations.**

#### **1. Is long-term planning being dumped?**

The KA is increasingly concerned by statements made by the authorities that long-term planning is unfavourably viewed, so that opportunities that bring about economic growth are not lost. **The KA's view is that this is a very dangerous path to go down since the economic benefits from such an approach will accrue very fast and be enjoyed by the beneficiaries but the negative impacts on communities and the national heritage, both in the medium and long-term, might be irreversible.**

The KA has for many years advocated the holistic review of local plans. Sadly, the adopted approach has been to review them in a piecemeal fashion resulting in uncertainty as to what the cumulative impacts of these changes would be on local communities and the national heritage. As if this was not damaging enough, masterplans for certain areas, such as Paceville, have been shelved and large-scale developments are still being given the green light. Such developments have the potential to compromise irreversibly the vision for a region which should be drawn up with the full involvement of the communities of that region.

#### **2. Developments in areas that are ODZ**

The KA is surprised by Government's misgivings on certain decisions that are taken by the Planning Commissions and its efforts to distance itself from them by claiming that such Commissions are independent. If Government had no say in the formulation of development plans and planning policies, then one could understand this reasoning.

However, Government is part and parcel of this process and no plan or policy is effective unless it is approved by Government. If policies are manifestly deficient, thus leading to long-lasting negative impacts on the environment, then Government can set immediately the process for changing such plans and policies and, if it so wishes, approve or amend such proposed changes. **The KA has on several occasions in the last years voiced its concern about the 2014 Rural Policy and Design Guidance but its appeals went unheeded.**

### **3. Some stakeholders, who are more equal than others, benefit from hesitancy in reviewing policy**

The official review of the 2014 Rural Policy and Design Guidance has now started with an invitation by the Planning Authority to the public to submit their comments on the objectives of the review of the policy. It is rather surprising that, thanks to the media, it has now been made known that a panel to review this policy had been set up without seemingly showing much urgency as to the seriousness of the detrimental effects of this policy. Moreover, the KA is not surprised that no consensus was reached among the members of the panel. How can one expect a consensus to be reached on such a policy when the interests of some stakeholders are so diametrically opposed to each other? **Policy-making should aim to achieve the common good. Many times, this requires positive discrimination towards vulnerable sectors and protection of the environment which is to be enjoyed by all. This also means not giving undue weight to arguments put forward by narrow-interest groups that have no regard for the common good.**

The KA queries why the approach to go straight to the first phase of the public consultation was not adopted. The long wait to set in motion the review of a policy has already been adopted in the review of the fuel stations policy during which time applications continued to be considered and decided upon. Notwithstanding the time lost to the detriment of the natural heritage, the KA welcomes the public consultation process for the review of the 2014 Rural Policy and Design Guidance.

### **4. Planning policies drawn up by non-planners**

The KA is surprised that planners within the Planning Authority are not in charge of reviewing this policy. This raises questions as to whether the Planning Authority is being divested of its policy-making function which is fundamental to its *raison d'être*. It is strange that this policy, that was not originally drawn up by planners is now, again, being reviewed by non-planners. Are there no skills available in the Planning Authority to carry out such a review? If not, then planning is indeed in a very bad state, and Government needs to take action to promote the planning profession and recognize it as a profession on its own if it wishes to make use of relevant skills in drawing up and

reviewing policies for the common good. **The country needs more, not less, planners who can engage in a meaningful manner with other professions, the politicians and the public, and be able to point out to decision makers the implications of various policy options that are available.**

## **5. A proper public consultation or one in name only?**

The KA wonders how the review of the 2014 Rural Policy and Design Guidance will be carried out in a matter of weeks when the objectives are still out for public consultation. The KA hopes that the submissions that will be made through the public consultation on the objectives of the policy review will be taken into serious consideration and not dismissed lightly so that an unrealistic deadline is achieved. The KA appeals to the reviewers of the policy not to be unduly influenced by stakeholders who have a narrow interest and who seem to be more relevant to the authorities, since these appear to listen to them more than they do to other stakeholders. **When shaping the urban and natural environments for current and future generations, the State cannot discriminate between its citizens, as if there were first-rate and second-rate citizens.**