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REACTION TO THE PROPOSAL FOR THE CONSTRUCTION OF A UNIVERSITY AT M'SCALA

ALL THAT GLITTERS IS NOT GOLD

The Interdiocesan Commission for the Environment (KA) has followed the developments in the case of the proposed building of a University at Zonqor Point, and is concerned on various points which are discussed below. The KA is absolutely not against any attempt at improving the education sector and at providing wider opportunities in the academic field.

Procedures for the granting of land in the framework of a land-use strategy

The Commission is surprised that while Government issues tenders for small parcels of land or buildings, in the case of the Zonqor Point project it has decided to choose an investor and grant 90 tumoli of land without any kind of competition. One would have expected that an international call for expression of interest for the building and operation of a University would have been issued. Such a step would have been the last in a series of steps which the Commission would have expected to see, namely:

1. First and foremost, the drawing up of a strategy for the development of the tertiary education sector in Malta, which takes into consideration not only the provision of tertiary education for the Maltese, but also to foreigners. Such a strategy would take into consideration any impacts that a substantial increase in the provision of tertiary education, either by one or more providers, would have on the operations and reputation of the University of Malta. Simplistic comments such as "another university will create competition to the University of Malta" betray a lack of understanding of various impacts that a new university project as proposed would have on the sustainability and quality of the provision of national tertiary education. Such impacts need to be addressed and resolved in a strategy. If the strategy reaches the conclusion that certain issues cannot be resolved satisfactorily for the common good, then the whole concept has to be revised.
 2. Assuming that a large educational project as proposed is in line with this strategy, then a land-use planning process (as part, if required, of the review of the structure plan or local plans) would be carried out to identify the land that needs to be taken up for such a project. The first obvious direction would be to designate land for the provision of tertiary education which is inside
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development zones irrespective of whether it is public land or not. Government can designate such zoned land to qualify for fiscal incentives so that the owners of the land are encouraged to let go of it. This is one way to encourage the use of vacant dwellings and/or land which is within current development zones.

3. Following the designation of such an area, then an international call for expression of interest would be issued with all the planning parameters attached to it.

The above process would have provided a transparent and environmentally-sensitive process for the setting up of a new university. It would also have gone a long way in trying to ensure that a new university would have more beneficial than negative impacts to the country at large including the country's provision of tertiary education. It would also have ensured that the whole concept is embraced by the population at large. Unfortunately, the whole process in the proposed project has been opaque, very insensitive to the environment, and its lasting impacts are not clear.

The concept of sustainable development

Sustainable development is not equal to whether a project is financially feasible in itself. It has to take into consideration the long-term impacts of the project on the environment, the economy and the social fabric as well as on other intangible resources, in this case the tertiary education provided by the University of Malta. It seems that this proposed project has focussed too much on the economic impact which may, however, not necessarily be reflected in an improvement in the quality of life of those living in the Southern part of Malta. This aspect has been mentioned as the reason why the project should be located in this part of the country.

Site selection "exercise"

The Commission is baffled at statements that this site is the most suitable one for such a development. It is more baffled by statements by MEPA that it was found to be so "after a preliminary assessment". The KA asks: Is MEPA oblivious to its own local plan policies and regulatory obligations?

In the past, Government has issued development briefs for prime sites within developed zones for which investors, after a competitive process, had proposed, and in fact, paid millions of euros for the land. The fact that it is suggested that the university project can only be feasible in the open countryside does not convince much given that students, the users of the project, will presumably be paying hefty amounts of money for courses. It all depends on the investors' expectations of the timeframe for the feasibility of the project, which may possibly be anything between 8 and 15 years.

The choice of the site disregards totally the value of the Maltese countryside which parts of the South of Malta still enjoy. Expressions like “abandoned farmland” which have been aired with respect to the selected site show that there is still a dismally low appreciation of the Maltese countryside in certain sectors of our society. In the not-too-distant past, all areas in Malta were developable according to the whims of the Minister responsible for building permits. Today, everybody is a living witness to the impacts of such a policy. Let us keep that dark period in Maltese land-use history as past history which should not be repeated. The gross disrespect to the environment in including large tracts of land for development in the 2006 so-called “rationalisation” exercise should serve as a more recent reminder of how anything-but-rational decisions relating to land-use can have negative long-term consequences on open spaces.

Planning gain

The proposed project has been presented as providing a planning gain in the form of a national natural park. We cannot understand this proposal since the nature park is already designated in the South Local Plan of 2006. The countryside is already there and the best that can be done for the time being, before ecologically restoring some of its areas, is just to leave it alone. As a comparison, when Yellowstone National Park in the USA was declared as a park in the nineteenth century, there was no need to build alongside it an area the size of New York City in order to provide funding for the park. Planning gain is a concept that should be used responsibly and sparingly. It should not be devalued. It is not a substitute for a proper planning process.

Package deals

Since its first opinion paper published in 2004, the KA has actively criticised and exposed development projects that try to mask their negative impact by piggyback riding on some overarching national need. This strategy generates confusion by presenting two (or more) unrelated issues as one indivisible lucrative package deal. The current proposal is a classic example of this strategy, in that it lumps into one deal the following standalone issues:

- **The need to regenerate the South**— an issue that the KA supports as long as the development proposed is sustainable for the communities of the region, i.e. a respite from the various major *projects of national importance* that have been bundled on the South with little, if any, consideration for the quality of life of the residents.
 - **The need to provide wider opportunities in the academic field**— an issue that the KA supports, as long as it is part of a planned strategy.
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- **The “unavoidable” need to build on virgin land** – an issue that the KA openly objects to.

Communications with De Paul University and the investors

The Commission has written to De Paul University, which is only involved in the development of curricula for the new proposed university and is not involved in any way in any other issue related to the project. The Commission asked it to

“impress on the developer to make all its efforts, in a sincere, transparent and diligent manner to find an alternative site for the proposed buildings in order to avoid having a negative impact on the countryside, a natural resource which is highly valued in one of the most densely populated countries in the world”.

In its reply, the University stated that it *“has a strong commitment to sustainability in Chicago and [they] will be happy to share [the Commission’s] concerns with [the investors]”.*

On its part, the Commission has already communicated its concerns to the investors.

Conclusion

Surprise announcements of large and impressive projects such as the one proposed for Zonqor Point, instead of impressing positively, have a greater chance, as has in fact happened, to shock negatively. If the proper process for allocating land to the investor, for selecting the property / land for the project, and the publication of any studies on the project’s impacts on the University of Malta were carried out, then the project would not have had the negative reaction, which it justifiably has had.

Finally, the KA notes with satisfaction the heightened environmental concern of various citizens and organisations expressed through their objections against the siting of the project.

18th May 2015
