



**THE CHURCH IN MALTA**

**COMMUNICATIONS OFFICE**  
Archdiocese of Malta

11<sup>th</sup> May 2017  
37/2017

## **TWENTY PROPOSALS TO POLITICAL PARTIES FOR THE 2017 GENERAL ELECTION**

The Church Environment Commission (KA) appeals to political parties so that during this pre-election time, they do not make unsustainable promises which later on will turn out to be detrimental to all especially to the most vulnerable. The KA appeals to the parties to promise that in the environmental sector they will commit themselves so that, with facts and with laws and policies that contain no loopholes which give rise to abuse, to protect the natural environment, the Outside Development Zones, the historical built heritage and buildings that have architectural value.

The natural, architectural and historical heritage of our country has a great value not only because it contributes to our identity as a unique people but also because it has an intrinsic economic value. When the Dwejra Azure Window collapsed, many people seemed to realise that our heritage, apart from being fragile, is also an economic resource because it attracts tourists. Above all, environmental protection is important for people's physical and mental well-being. It is within this context that the KA is proposing the following twenty proposals to the political parties:

### **1. Power of veto to the Environment and Resources Authority**

The Environment and Resources Authority should be granted the power of veto on all development permit applications that are proposed in Outside Development Zones, including natural heritage sites. Through the veto, the Authority would have the required clout to protect the environment. The Authority should also have the power of veto on any application that is intended to reduce the level of protection of sites of natural heritage.

### **2. Power of veto to the Superintendent of Cultural Heritage**

The Superintendent of Cultural Heritage should be granted the power of veto on all development permit applications that are proposed, that would affect archaeological sites and scheduled sites and buildings. The Superintendent should also have the power of veto on any application that is intended to reduce the level of protection of archaeological sites or scheduled sites and buildings.

### **3. Full revision of planning policies relating to developments in the countryside**

A full revision is required of the planning policy that allows piles of rubble in the countryside to be turned into residential buildings or structures that are not strictly required for agricultural purposes. This is an abusive policy which is causing grievous injury to the countryside.

### **4. Revision of development plans and planning policies**

A full revision is required of the Strategic Plan for the Environment and Development (SPED), local plans, master plans, action plans, and any other development plan and planning policies (including the tall buildings policy) so that these plans and policies truly safeguard the common good, and this following a proper public consultation which is to be carried out with all stakeholders. In the final stages of the setting of a plan or policy, following a proper public consultation exercise, no new development proposals which are intended to intensify, instead of reducing, development in the targeted areas are to be included in the plans, as this would lead to negative impacts on the affected communities.

### **5. Noise Control policy**

A policy needs to be adopted to restrict loud music and noise emanating from discotheques, parties and commercial establishments, which affect residential areas and the calm environment especially at night-time. Such noisy activities need to be restricted to indoor places. It is unacceptable that residents have to close their windows to try to sleep, and still cannot do so because of the deep disrespect on the part of owners of such establishments and organisers of parties, weddings and festivals. Research clearly shows that exposure to high levels of noise is harmful to one's health and is likely to create stress. No one should be denied the right to enjoy peace and quiet, both in public places where many go to enjoy peace and quiet (e.g. beaches), but especially in one's own home. The same policy needs also to address the excessive use (or abuse) of petards at religious feasts and other occasions. In certain cases, the use of such petards reaches unacceptable noise levels apart from the dangerous pollution which they cause.

### **6. Light Control policy**

A policy is required that restricts unnecessary illumination. Besides being a waste of energy, such practice denies others the right to enjoy the night sky and interferes with the life pattern of various creatures. There are too many cases where bad design and light intensity are totally insensitive to the night-time environment. At times the intensity of light coming from certain discotheques and commercial establishments is so high, that it would be visible from kilometres away. Such a policy needs also to address the illumination of buildings, including churches, and industrial and commercial establishments.

## **7. Policy relating to the use of illegal establishments for political and philanthropic purposes**

A policy is required which prohibits the use of illegally built establishments for activities related to political and fundraising activities for charitable purposes. Irrespective of whether such policy is introduced or not, then political parties and other entities are to refrain from making use of such venues until any illegality has been regularised. In this way one would not get the impression that there is some kind of sanction or approval for illegalities and egotism by whoever may consider himself above the law which regulates other citizens.

## **8. Members of Parliament to submit a written declaration relating to applications for permits**

Members of Parliament should submit an annual written declaration to the Speaker detailing their personal interest in any development permit application or application for an environmental permit. This declaration is to include any interest pertaining to a member's family be updated as required during a particular year. Applications for development and environmental permits may reflect an MP's attitude towards the environment especially where he/she would be abusing policies through the loopholes these may have.

## **9. Members of Parliament to submit a written declaration relating to positions they hold in companies and private enterprises**

Members of Parliament should submit an annual written declaration to the Speaker detailing the positions they hold in companies and private enterprises. Good governance requires that citizens should know whether their elected representative is part of an organisation that is proposing a project which goes against the common interest. Such a written declaration may be updated more than once a year as circumstances arise.

## **10. National property study**

Government, through an independent institution, should carry out and update annually a study that analyses the trends in the supply and demand for property in the country. This study and its updates should be published in their entirety. The terms of reference should be agreed upon by a wide spectrum of stakeholders. This study should inform development plans and policies that would be drawn up and Government's social and fiscal policy.

## **11. No secret promises**

Secret promises between the political parties and individuals (which will then be translated into personal gain for the few at the expense of the common good) should never be made, particularly during the days prior to the general election.

## **12. No promises to be made relating to particular land-use projects or specific land**

In the days before the election, no promises should be made that refer to particular land-use projects or other projects that identify a particular land that would be used for a particular development. When this takes place, the need for a serious environmental impact and sustainability assessment of the project would be undermined because “the people would have decided”. Such promises vitiate the whole planning process which should safeguard the interests of the whole community. An electoral victory should not justify the elimination of a process that evaluates the complex impacts of a particular project. If this occurs, the common citizen would have been deprived of the right to access all the facts so that he will be able to analyse calmly the proposed project.

## **13. Full transparency and publication of Cost-Benefit-Analysis (CBA) studies**

In a post-truth era which also includes fake news, decisions relating to the environment need to be based on studies that reflect the reality of facts and not twisting of facts so that particular interests are favoured. Full transparency in the whole process of a decision relating to a project (from its conception to its approval) requires that the information relating to the project is published. In those cases, where a project is going to be financed by the European Union, the KA believes that the Cost-Benefit-Analysis (where this is required by EU regulations) should be published, and not hidden under the excuse that the information within it is commercial.

## **14. The environment, the national heritage and the common good of communities are not for sale**

The weeks prior to a general election are very often good opportunities for people to beg for favours which will in turn be exchanged for development projects. The KA would like to remind the political parties of the principle that the environment, the national heritage and the common good of communities cannot be traded.

## **15. Transparency and fair competition**

A reform is required so that there is transparency and fair competition in the way Government rents out, grants by title of emphytheusis and transfers public land or property to third parties.

## **16. Restrictions to the use of direct orders**

The use of direct orders to implement small or large projects does not always guarantee that Government would be choosing the best way to address an environmental or infrastructural issue. This can lead to interventions that damage the environment or scheduled sites or buildings. Therefore, the use of direct orders should be discontinued except in the case of exceptional cases where urgent works are required which in their

absence would cause injury to people or irreparable damage to the environment or scheduled sites or buildings.

### **17. Checks and balances at the Planning Authority**

Checks and balances need to be introduced at the Planning Authority so that decisions are taken in favour of the interests of all. We are running the great risk that the homeland that we would like to live in in twenty years time will not be shaped by a vision that is inspired by the needs of the common good and those of future generations. The vision of our homeland in twenty years time should not be allowed to be shaped by a few people who can influence planning policies and decisions at the expense of the common citizen.

### **18. Traffic solutions**

Road traffic is the major cause of pollution in our islands and causes daily inconveniences to people in various parts of the country. There is an urgent need to explore various proposals with the aim of addressing such a serious problem. The solution is not to build more roads. This is because the problem would only be solved for a few years. Such a strategy will bring us to a point when more countryside would have been taken up by the roads, more cars would have been purchased because we would have been led to think that the country can manage more cars and then after a few years we will realise that we would have got back to the same situation where we are today. The solution seems to be in decreasing car use and the introduction of mass transport systems. Apart from this, commercial centres should not be choked by cars, and therefore efficient and effective park-and-ride systems should be introduced so that people are really encouraged to use them and be better served than if they were to use their private car. In this context, the KA believes that the proposed underground carpark next to Mosta Rotunda should be abandoned and a park-and-ride system devised that would carry visitors to the Mosta centre. Parking spaces should be reserved as a priority for those who need them most, such as people with disability, old people with mobility problems and families with very young children.

### **19. Public consultation during the initial stage of a Cost-Benefit Analysis (CBA) on options for a project to be financed by the European Union**

When a project is being proposed to be financed by the European Union and would require, according to EU regulations, a Cost-Benefit Analysis (CBA), a public consultation exercise should be carried out at the initial stages of the CBA, so that alternatives to the project can be identified that can still lead to reaching the final of the proposed project. In this way, one would ensure that the alternatives to reach the end objective would have been really assessed before choosing the final project. At the moment, although such alternatives are assessed, no public consultation is carried out. The lack of such public consultation at this stage of the CBA is a big pitfall. Public consultation can lead to the

identification of alternative projects that would lead to reaching the same objectives as those of the originally-identified project. Such alternatives may have environmental, economic, financial and social impacts which may be more favourable than those of the project that would have been originally identified by the administration of the day before the start of work on the CBA. The current Regulations of the EU do not exclude such public consultation, but it is not considered as obligatory. It is the KA's opinion that this should be mandatory and intends to put forward a suggestion to the EU in this regard, since it feels it would be beneficial not only to our country but to all EU member states. The KA believes that in the local context such public consultation should be introduced irrespective of the EU's decision. It should start to be carried out in the case of mass transport systems (mentioned in Proposal 18) and in the case of the tunnel between Malta and Gozo.

## **20. The proposal of a tunnel between Malta and Gozo**

- 20.1 The proposal of an underwater tunnel between Malta and Gozo seems to have wide support among the political parties. The end objective of this project is to provide accessibility between Gozo and Malta which is better than the current one.
- 20.2 The KA believes that before a decision is taken on the tunnel, options that offer an alternative to the tunnel should be studied. The aim of such options would be to provide the same objective as the tunnel, namely improved accessibility between the islands.
- 20.3 As mentioned in Proposal 19, in the case of the project being financed by European funds, there should be public consultation at the initial stage of the CBA so that alternative projects that provide improve accessibility between the islands are studied. In this way, the tunnel will not be presented as the sole solution when other alternatives will not have been seriously studied. The public consultation exercise together with the preparation of the CBA should be carried out even though EU funds may not be sourced for the implementation of the project.
- 20.4 One of the alternatives that should be studied is a service which is faster than that provided by the current one, and which ferries passengers and vehicles to Grand Harbour and/or to another destination.
- 20.5 Another alternative is to have a mix of services, for example a service between Gozo and Cirkewwa which would include new and modern ships together with a fast service between Gozo and other destinations in Malta.
- 20.6 If these alternatives and others that may be proposed during the public consultation are assessed, it is possible that the financial, economic, environmental, cultural and social impacts of one of the alternatives may be more positive (or less negative) than those of a massive project of a tunnel which during its boring and operations can have major negative impacts. This is being said without going into the merits of the relative risks of the tunnel project when compared with the risks associated with its

alternatives. One cannot forget that with or without a tunnel there would still be the need for a ferry service between the two islands. The first reason is that tourists may still prefer to enjoy the views of the countryside on their way to the ferry and the sea views from the ferry, instead of having a wall-view of several kilometres. The second reason is that there needs to be a working alternative to the tunnel in case it needs to be temporarily closed for some reason or other.

- 20.7 The cost of a massive and irreversible tunnel project carries the risk that, unlike smaller projects, cost variations will be large. A variation of a few millions on a small project is one thing. A variation of many millions is another issue. Such big cost overruns will have to be borne by the whole population.
- 20.8 The affordability of the service of alternatives to the tunnel project needs to be studied. The accessibility service by means of a tunnel or other alternatives will not be free. No proposal of an improved accessibility, even if it has a public-service obligation, will be free. Costs will have to be borne, be it by the users, the operator, the Government or the taxpayers. In order to take a mature decision on the final project, the price which would eventually have to be paid by the users will need to be calculated meticulously and published prior to any decision being taken on the project.
- 20.9 The social and cultural impact on Gozo is a fundamental aspect which needs to be assessed with care. A tunnel may lead to Gozo becoming just like Malta which has lost, in many areas, the beauty of its characteristic landscape.
- 20.10 The economic impact that the tunnel may have on Gozo has been mentioned many times. This impact has to be studied in detail and detached from the point of view that the solution for the economic and investment problems in Gozo lies only in resolving the accessibility issue (be it the tunnel, or any other means of accessibility for that matter). In this context, the KA asks for the publication of all studies and surveys that have been carried out under the last two administrations in relation to Gozo and which have studied the issues of investment in Gozo, the accessibility and employment opportunities that can be created because of a tunnel or other means of improved accessibility. Moreover, when one considers the quoted estimate of the expense for this project, one should carefully reflect whether it would be more beneficial for the Gozitan community to have the sum quoted invested in projects with the aim of boosting the Gozitan economy.
- 20.11 At least two serious alternatives to the tunnel need to be chosen and studied as part of the CBA together with the tunnel proposal. Above all, the KA insists that the choice of alternatives being studied needs to be carried out after a public consultation. Competition of ideas from innovative enterprises can lead to the discovery of the optimal solution from an environmental and social aspect to the accessibility problem between Gozo and Malta.

Gozitans face big challenges in enjoying a just share of the country's common good. Therefore, the process of choosing the best means of accessibility between the islands has to assess and consider in detail the Gozitans' point of view. The choice-making process should be one in which the protagonists have an open mind to all possibilities that make sense to the country as a whole. In order to take a final decision which benefits the common good of the whole country, but, in this case, of Gozo and the Gozitans in a particular way, the following requisites are fundamental: (i) transparency in all the decision-making process; (ii) the publication of all studies (before and not after a decision is taken); (iii) decent time is allowed for the studies to be analysed from whoever is interested; (iv) a rigorous planning process. In the absence of these principles, the KA believes that opinions that will be formed in relation to the best option for an improved accessibility between the islands will not be informed. This can lead to a privileged interest group influencing in a disproportionate way a decision which is so important and which will have a permanent impact not only on Gozo and the Gozitans, but on the whole country.