



## **Kummissjoni Interdjoċesana Ambjent**

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### **The Development of the South-East Coast of Malta**

Considering the high population density of our islands, one rightly expects land space to be managed with great care to ensure that any development would sustain it for a good number of years. Therefore successful management in this regard implies that this is carried out in a strategic planning framework that integrates various needs, so that the common good is safeguarded. We have to ensure that past mistakes are avoided and that one particular project does not undermine the objectives of other projects. Taking the coast as an example, the insensitive development carried out over the years, besides destroying permanently our precious natural heritage, has disrupted the growth of the tourism industry which it was supposed to promote. The years rolled by and we have apparently learnt very little from our past mistakes.

It seems our country is faced with yet another attempt to build at least two hotels and a promenade on a large stretch of land on the south eastern coast – from Zonqor point to Smart City! Once again the proposal pledges that this project will generate economic prosperity. It is worth remembering that our country has experienced no economic crisis whenever common sense prevailed and such projects did not materialize.

In two opinion papers issued under different administrations,<sup>1</sup> the Church Environment Commission has warned that if we persist in finding ways and means to justify construction on land which is ODZ, our country will continue to suffer irreparable damage to the natural environment with all the repercussions on social and economic development.

The *Kummissjoni Interdjoċesana Ambjent* (KA) is surprised that one of the reasons put forward to justify this project is that this land is disturbed. Should one accept this line of thinking, one would expect whoever has the sustainable development of the locality at heart, and is really aware of what this involves, to propose the ecological restoration of the area including the rehabilitation of the Jerma Palace Hotel.

Moreover, the KA cannot understand why the information available so far on this proposal has only appeared on a local newspaper which was eventually followed by other papers and reacted to by environmental organisations.

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<sup>1</sup> Kummissjoni Ambjent (2006) *Opinion Paper: It-tibdil fil-konfini tal-iżvilupp* Arċidjoċesi ta' Malta

Kummissjoni Interdjoċesana Ambjent (2013). *Reazzjoni tal-Kummissjoni Ambjent tal-Knisja fuq l-abbozz ta' policy li tittratta l-iżvilupp li jseħħ barra mill-konfini tal-iżvilupp ("ODZ policy")*.

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In view of all this, the KA feels it is its duty to ask:

Which study, if any, is underpinning the proposal in question? Which criteria have been used to define this stretch of land as of little value, since it is “disturbed”? Which social analysis or economic projections have been carried out so that whoever is proposing such project can guarantee that the surrender of this large stretch of land will yield the promised projected benefits? How does this project fit into the proposed national land-use strategy? Should we run the risk of heading towards a disjointed planning process where projects involving large tracts of land crop up without any reference to a proper national land-use strategy?

Should not projects of this size and type be in line with a properly-drafted national strategy so that in, say, 20 years’ time we would not be far from where we, today, would like the country to be in terms of sustainable land use?

Does the project fit into the national tourism policy? Is more investment in new hotel accommodation using national assets, such as land, desirable? Are such projects in line with plans intended to promote rural tourism as part of a strategy to boost sustainable tourism? Such a strategy would protect the development of this industry from the interests of whoever is simply after its exploitation.<sup>2</sup>

The fact that this project does not feature in any development plan, and that the *Privatization Unit* seems to be taking an important lead in this proposed project, may give the impression that developers’ interests override the need for a strategic direction for land-use planning in the country. The KA, therefore, strongly encourages the competent authorities to think twice before giving the green light to such projects, and take into account the heavy price we would all have to pay if this stretch of land were to end up being translated into an increased economic benefit for the few, instead of the common good.

15th December 2014

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<sup>2</sup> See also: Kummissjoni Ambjent (2006) Opinion Paper about Sustainable Tourism. Archdiocese of Malta

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