

30th May 2018
57/2018

IS THE FATE OF ST GEORGE'S BAY HANGING IN THE BALANCE?

REACTION BY THE CHURCH ENVIRONMENT COMMISSION TO THE PROPOSED DEVELOPMENT AT ST GEORGE'S BAY

The Church Environment Commission (KA) feels that the proposed development by db Group at St George's Bay runs roughshod over a planning system that is meant to create and serve sustainable communities. This is symptomatic of a planning system which is fast being dismantled to make way to a system in which priority is obviously being given to individual projects rather than to community needs – a clear consequence of ill-advised policies and controversial decisions. What is particularly worrying is that certain decisions seem to suggest that an authority tasked with planning to safeguard public interest is forfeiting long-term plans for a piecemeal approach to so-called development.

Such a system does not keep the common good as its main objective, and therefore is bound to create hardships for communities and to profit speculators who, in this particular case, are also being supported by Government (and indirectly by the common taxpayer) that is granting land to them. At this point, the question that comes to mind is: whose interest is the Planning Authority (PA) protecting?

The KA's objections to the PA about the proposed project are based on the following reasons:

1. The Floor-Area-Ratio is not being followed in various instances most particularly in the following three cases: (a) 50% of the site area is not being designated as truly public open space; (b) the height of the buildings is calculated assuming that this percentage is being respected when in fact it is not and (c) the height of the buildings is too excessive given the context where they are to be situated.
2. The magnitude of the project makes it evident that little, if any, consideration has been given to its impact on the adjacent communities, in terms of traffic generated, visual impact and shadowing.
3. According to Traffic Impact Studies, major infrastructural works, including a new major junction and a new tunnel servicing the area are necessary to address effectively the traffic which this development will generate, together with the

cumulative effect of other large-scale developments in the area. It is expected that these major infrastructural upgrades need to be committed to before the project is approved. These major infrastructural works, which ironically may partly be paid for by Pembroke taxpayers' money, emphasise the scale and therefore the impacts that this project will have on the nearby communities.

4. The project will possibly have a negative impact on the Natura 2000 site at Pembroke which should continue to enjoy the highest protection at EU level.

It is ironic that the company that is earmarked to operate a hotel from the site,¹ namely Hard Rock Hotels, has as its mottoes “Love All – Serve All, All is One, Take Time To Be Kind, Save the Planet”². The Hard Rock Hotels website also states that:

“Music may be our differentiator, but philanthropy is our soul. Since 1971, Hard Rock has believed it’s our duty to help protect the planet and give back to our communities. We have a deep compassion for others and a dedication to making the world a better place to be.”

Hard Rock Hotels’ motto is almost offensive and insensitive to the Pembroke community, which would suffer all the negative impacts of this development if this proposal were to be approved. The KA is separately appealing to Hard Rock Hotels to impress on the developers to rethink the project proposal with which the Hard Rock Hotels is closely associated.

With mega-projects like these, who needs masterplans or local plans? Such projects compromise any meaningful master plan or local plan since the latter would be held hostage by the impacts of such large-scale projects. The local plans for the Maltese Islands were mostly approved in 2006. However, they reflect an earlier reality since they were drafted earlier than 2006. Since then, there have been demographic, economic and social changes which require that these plans be reviewed in order to safeguard and improve the quality of life of the communities. We therefore appeal to the Planning Authority to insist with Government to review and publish updated local plans. If such plans have already been reviewed, then why have they not yet been published for public consultation?

The KA urges the PA to monitor and publish reports on how the policies that it and the Government are approving impact communities. The PA is failing communities by not carrying out such tasks. We seem to be living in a post-planning era where projects are negotiated and commitments made prior to rigorous studies and effective public

¹ <http://news.hardrockhotels.com/hard-rock-international-continue-electrifying-mediterranean-new-resort-malta/>

² <https://www.hardrockhotels.com/culture.htm>

consultation are carried out. Such negotiations and commitments from the part of Government attempt to hijack the planning process where developers' demands supersede any aspirations of communities of residents with the result that the interpretation of policies is being stretched to absurd lengths.

The KA refers to the list of proposals it had presented to Government in December 2015, which are inspired by Pope Francis' *Laudato si'*. It invites everybody to reflect particularly on three which it believes are relevant to the project for St George's Bay.

1. We invite Government to fund a long overdue and truly national study on the demand and supply of Maltese properties and the fiscal and economic environment that has a bearing on them. The terms of reference for such study should be issued for public consultation and enjoy the widest agreement possible by all stakeholders.

Such a study affects the whole nation and should be treated as such and when finalised should be published entirely. Its implications for planning purposes, the safeguarding of the environment and affordable housing are widespread. This study, when completed, should be updated regularly and be an important source for the Strategic Plan for Environment and Development (SPED) and the Local Plans. Otherwise, decisions related to the built environment are not going to be informed as they are expected to be especially in the case of a densely-populated country like ours.

Applicability to the proposed project: A large amount of all types of properties are being developed and put on the market. Our appeal to Government, which appeal is now two and a half years old, is to carry out such study so that decisions aimed at creating sustainable developments can be made. The recent call by the Malta Hotels and Restaurants Association (MHRA) to carry out a tourism carrying capacity study³ is just one aspect of this multi-faceted study. The KA still cannot understand why Government has not taken any measures to carry out such study. The construction industry and property market study commissioned by the Malta Developers Association (MDA) – which is still waiting to be published for public scrutiny – does not address this need, as it fails to explore the true impact of the industry on our social fabric and our environment (both essential features for a good quality of life).

2. We appeal to Government to carry out the necessary reforms in how it leases out or disposes of property belonging to the whole nation and to ensure transparency in the granting of environment-related tenders.

³ <https://www.timesofmalta.com/articles/view/20180518/local/mhra-tourism-warning.679389>

Government is the largest landowner in the country and it has to ensure that the property under its stewardship is managed in a way that is transparent and does justice to the whole nation and to future generations.

Applicability to the proposed project: Unfortunately, doubts have been publicly expressed in relation to the process through which this land is being granted by Government together with the valuation methodology carried out to determine the value. Because of this project, the ITS campus has to be relocated to a temporary facility at Luqa. After a few years the ITS campus is planned to be relocated again, this time to SmartCity. Even if the developer will be sponsoring part of the expense incurred in these two moves, few, if any, considerations seem to have been given to the disruption that students may suffer as a result of this double relocation.

3. We invite enterprises to make corporate social responsibility more than just a marketing exercise that includes photos of employees giving a helping hand in cleaning the countryside or carrying out renovation works in places that host disadvantaged people.

Although such activities are noble in themselves, directors and top management of enterprises are called to give a greater service to the community by seriously examining their enterprises' products and processes to ensure these are not detrimental to both the environment and the well-being of their employees and ordinary citizens. Our invitation is not just one for such enterprises to respect national laws. Such respect for the laws is a basic starting point and is not for discussion. Our invitation is about going beyond the basic requirements of the law and giving a positive contribution to a new way of carrying out a legitimate activity and improving the environment.

Applicability to the proposed project: The KA is separately appealing to Hard Rock Hotels (copy attached) to impress on the applicant to revisit the whole proposal so that the communities are truly respected in accordance with Hard Rock Hotels' declared culture.