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**K A M R A T A L - P E R I T I**

*To support members of the profession in achieving excellence in their practice of architecture and engineering in the interest of the community*

Our Ref: 8/7

Hon Dr Owen Bonnici  
Minister for Justice, Culture and Local Government  
30, Old Treasury Street,  
Valletta

5<sup>th</sup> December 2017

Dear Hon Dr Bonnici,

Reference is made to your Parliamentary speech of the 27 June 2017 regarding the Budget Estimates for the Superintendence of Cultural Heritage (SCH).

In such speech, you commented that when you took over responsibility for the SCH it was severely understaffed, and stated the intent to increase the staff complement by over 20 officers over two years. You also referred to the premises housing the SCH, and Government's intent to address the issues faced by the current offices.

In your speech, you also made reference to the demerger of the Malta Environment and Planning Authority, and stated that as a result of this demerger the SCH had been strengthened. To support this statement, you outlined that, in 2015 the SCH assessed 1,099 applications for development permission, whereas in 2016 it had assessed 5,412 applications, practically a five-fold increase.

While there is no doubt that the statistics are correct, the *Kamra tal-Periti* is of the opinion that your statement was somewhat misleading in that the increase is a result of the new legislation which requires the SCH to assess each and every application for development permission, irrespective of its impact on cultural heritage matters. Prior to the demerger, the SCH only had to deal with those applications that posed a clear and direct threat to our heritage, whereas now it has to assess even the most trivial of applications, thus impacting heavily on its workload. While the Kamra agrees that, in a country as small as ours, many types of development may impact on our village cores and architectural and cultural heritage, we are now in a situation where the SCH is overloaded with applications to assess, to the extent that it is failing to keep up even with those applications that should fall within its direct remit.

The situation of this overload is now such that one of the main causes of delays in the planning process is precisely that caused by the Superintendence of Cultural Heritage itself in assessing the applications referred to it. Despite the fact that all applications are now referred to the Superintendence, it has not been given sufficient resources to deal with the immense workload it is faced with on a daily basis. Periti have reported delays of several months in the application process, sometimes simply waiting for the Superintendence to give a date for a site inspection.

Thus, rather than strengthening the SCH, the MEPA demerger has effectively weakened it, since it was not provided with the necessary resources to adequately address the workload it now faces.

The *Kamra tal-Periti* is available to discuss this matter in further detail at your earliest convenience, and trusts that you will give this your most urgent attention.

Yours sincerely,

**Prof Alex Torpiano**  
**President, Kamra tal-Periti**