

**Intent for the  
National Strategy for the Environment  
and its Vision for 2050**

*Comments by*  
**KAMRA TAL-PERITI**

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The *Kamra tal-Periti* is the only recognised professional body representing the architectural and civil engineering profession in Malta. It is established according to the provisions of the Periti Act (Chapter 390 of the Laws of Malta). Its mission is to support members of the profession in achieving excellence in their practice of architecture and engineering in the interest of the community. It is also delegated with the duty of enquiring into any charge of professional conduct or abuse made against any perit in connection with the exercise of their profession or with professional matters.

The administration of the *Kamra* is entrusted to its Council which consists of periti elected from amongst its members. The Council is supported by a Secretariat and several Standing Committees including those for the Built Environment, Professional Conduct, International Affairs, Education, Professional Practice, Events, Communications and Finance. A separate workgroup is looking into the setting up of a Centre for the Built Environment.

The *Kamra tal-Periti* is an active member of the Architects' Council of Europe (ACE), the Union of Mediterranean Architects (UMAR) and the European Council of Civil Engineers (ECCE). It is affiliated with the International Union of Architects (UIA), the European Forum for Architectural Policies (EFAP) and the Commonwealth Architects Association (CAA). The *Kamra* has representatives on several bodies in Malta including the *Bord tal-Warrant tal-Periti*, the Building Industry Consultative Committee (BICC), the General Services Board (GSB) and the Users' Committee of the Planning Authority.



**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*

The Ministry for the Environment, Sustainable Development and Climate Change, together with the Environment and Resources Authority, has embarked on a consultation process to establish the overall objectives for a National Strategy for the Environment.

**The proposed key objectives of the Vision for 2050 are to:**

- Envision our environment in the long term;
- Set the context and become the guiding principles for developing the Strategy itself;
- Outline the strategic aspirations for the environment.

**The proposed overall objectives of the NSE for 2050 are to:**

- a) Ensure a better and sustainable quality of life;
- b) Provide clear and long term direction for our environment;
- c) Set out national environmental targets;
- d) Address the main environmental challenges Malta is facing;
- e) Integrate and synergise efforts of all policies and stakeholders who directly or indirectly influence the state of our environment.

The following are the consultation questions, and the *Kamra's* corresponding answers:

**1. Do you agree with the proposed overarching objectives of the Strategy?**

The proposed objectives are generally positive, although it is noted that the term "*environment*" itself is not actually defined in the consultation text. The Environment Protection Act (Chapter 549 of the Laws of Malta), defines the "*environment*" as "*the whole of the elements and conditions, natural or man-made, whether together or in isolation, and in particular:*

- (a) the air, water, land, soil and sea, including their bedrock, aquifers and subsurface features;*
- (b) all the layers of the atmosphere;*
- (c) all biodiversity; and*
- (d) the landscape and its features."*

This **definition** is wide-ranging, and encompasses various factors which have a direct, and often serious, impact on our quality of life. Thus, it is the opinion of the *Kamra* that this Strategy cannot be formulated unless there is consensus across the board.

**Integrated Governance** is key to the success of the Strategy, and requires that overarching policy direction and all sectoral Government policies are aligned, including, but certainly not limited to, policies related to the economy, planning, transport, tourism, education, health, water and energy, industry, and agriculture.

The *Kamra* is therefore of the opinion that a **Policy Coordination Unit** should be established without delay within the Office of the Prime Minister, to ensure that all policies which are currently being drafted are coherent with, and have the same objectives as, the proposed Strategy.

It is also noted that the Strategic Plan for the Environment and Development (SPED) is now reaching the end of its intended lifetime, and there is no doubt that this Strategic Plan has failed. The Vision for the SPED, outlined in Section 1.27 thereof, outlines a number of targets, including that:

- a) *The Maltese Islands shall raise their potential for social and economic growth in the core sectors of Financial Services, ICT, Tourism, Advanced Manufacturing, Aviation, Maritime, Health, Education, Life Sciences, Creative Industries, Research and Innovation, Digital Gaming and Eco-Gozo;*

- b) *The Maltese Islands shall improve the quality of life and wellbeing, particularly for vulnerable groups, and the environmental awareness of their people;*
- c) *The Maltese Islands shall move closer to a low-carbon, zero-waste, green economy, and shall halt the decline of their biodiversity, improve the quality of their water resources and use space sustainably;*
- d) *The Urban Area shall become an attractive place for people to live, work, play and interact;*
- e) *The Urban Area shall be clean, pollution free, safe, green, distinct, evoke a sense of openness, energy efficient and generate energy from micro-renewable infrastructure;*
- f) *The historic cores shall become vibrant and their townscapes harmonious;*
- g) *The Urban Area shall have a network of economically dynamic urban hubs and walkable neighbourhoods with clusters of local facilities;*
- h) *The Rural Area shall sustain the livelihood of farming communities through modernisation of agricultural practices and diversification of compatible rural activities;*
- i) *The Rural Area shall remain a place where people can escape from daily urban life, visually pleasant and rich in biodiversity, and shall become better green lungs with less buildings and dereliction, more accessible and more resilient to the impacts of climate change;*
- j) *The Coastal Zone and Marine Area shall maximise the potential for sustainable socio-economic growth and renewable energy infrastructure, accommodate legitimate compatible uses, sustain the livelihood of the fishing community, remain rich in biodiversity, be visually striking and become pollution free and accessible for public enjoyment;*
- k) *The Coastal Zone and Marine Area shall play a significant enabling role for the Maltese Islands to reduce their impact on climate change and strengthen their capacity to adapt to climate change;*
- l) *Gozo shall become an ecological island, protecting the Gozitan lifestyle, the island's environment, resources, culture and identity, ensuring that these play a significant part in attracting more visitors to the island;*
- m) *Gozo's economic development shall be based on the provision of adequate employment opportunities (especially youth employment), enhanced accessibility as well as increased support for a healthy, inclusive society, protection and proper management of its environment and the preservation of its cultural heritage.*

A long list of ambitious and extensive targets. Sadly, most, if not all, of these targets have scarcely been addressed, let alone achieved. It is further disheartening to note that, in some cases, we have only managed to achieve negative results in certain targets, with rapidly deteriorating urban environments leading to community alienation and the disintegration of traditional community support structures, urban development further feeding into scarce green public open space, deteriorating air and water quality, severe mobility issues and growing threats to Gozo's potential as an ecological island.

The current consultation process does not specify whether the proposed Strategy is intended to work alongside the SPED or to replace the SPED in its entirety or in part. In the latter case, it is unclear as to how the respective policy documents will be handled together. Translating the targets of the Strategy into spatial terms is an essential aspect of its success or failure, and this reinforces our opinion that it cannot be formulated in isolation from other policies. Unless the Strategy is translated into spatial planning policies, it will be nothing but subservient to them.

**Measurability** will be key to the credibility and success of the Strategy. This requires the establishment of a clear integrated framework of **specific indicators** across a broad spectrum of environmental criteria, against which one can establish a clear **baseline**, establish **targets** for improvement, and measure regular **progress**. The European Union's Reference Framework for Sustainable Cities (<http://rfsc.eu/european-challenges/>) can provide a basis for such an integrated framework.

## **2. Can the objectives be further refined, keeping in mind the long-term goal of this Strategy till 2050?**

Just like the dire need for a clear definition of the term '*environment*', the objectives identified as part of this consultation process need to be defined not only within the local context, but also reflecting recent developments since the SPED (and possibly using the now superseded 2015 State of the Environment Report). The question as to what constitutes a sustainable quality of life needs further elaboration. Without a common and agreed definition of '*quality of life*', tied to a set of measurable indicators, there is the risk of being too aspirational and in turn, ineffective.

The objectives of the Strategy need to include a review of existing '*environment*' policies, those that have been drafted before from a strictly environmental perspective (e.g. National Environment Policy), as well as those policies in other sectoral policy documents (e.g. energy, transport, agriculture, water, and so on) that have an environmental impact.

The long-term goal of this Strategy should be seen as an opportunity to first develop a vision and then a strategy with strict timeframes for delivery of measures and achievement of targets. It seems from the consultation document that the terms *vision* and *strategy* are used without much consideration of their meaning and value to the process. Strategy, with defined short, medium and long-term objectives, should follow a long-term vision, taking us to 2050.

## **3. What aspects do you retain to be crucial to consider in the vision for 2050?**

The failure to uphold the SPED objectives stem from a number of factors, primarily the lack of institutional capacity for integrating and supporting environmental concerns in aspects of development planning, transport, agriculture, water and other sectors, but also the prioritisation of short term politically driven policy over long term institutional and public commitment to address the impending environmental risks these islands are facing. Planning practices, underpinned by poor forward spatial planning, and a misguided drive to approach planning only as. The lack of land use planning and the practice of development control need to be separated as evidently their "*institutional integration*" have failed us. Planning is a necessity - a failure to plan is a perfect plan to fail - planning is therefore a crucial aspect of the Strategy.

Some of the issues that are considered crucial for consideration in the 2050 vision include:

- Urban environmental improvement including urban greening, but also better designed development (building and infrastructure) with a higher standard of materials, construction and energy use;
- Reduced air and noise pollution;
- An effective, environment friendly, energy efficient public transport system and a strategy for mobility;
- Improved infrastructure for pedestrians and cyclists, also as a means for promoting healthier lifestyles;
- The protection of rural land, peri-urban areas, natural habitats and the coastal zone, as well as open spaces within the development zone;
- A proper assessment of the effects and impacts of land reclamation on the environment, available resources, and the country's main economic sectors;
- Waste management;

- Water resources;
- Valorisation of globigerina limestone as a finite and scarce resource and its use in a sustainable manner;
- Education;
- Sustainability of our biodiversity;
- The impacts of, and measures to adapt to climate change;
- The promotion of sustainable agriculture and fisheries practices and the quality of food produce.

#### **4. What parallel developments would you expect to see to enable a sustainable quality of life?**

At the UIA (*Union des Architectes*) Congress which took place in Durban (South Africa) in August 2014, UIA member organisations, including the *Kamra tal-Periti*, and the architecture councils of Europe, Asia, the Americas, and Africa, representing architects in 124 countries worldwide, unanimously adopted a historic Declaration committing themselves to promote environmental and social sustainability in the built environment.

The Declaration on the 2050 Imperative recalls that urban areas are responsible for over 70% of global energy consumption and CO<sub>2</sub> emissions, mostly from buildings. Through this Declaration, the world's community of architects recognised the urgency of fighting climate change by setting the global building sector on a path to phase out CO<sub>2</sub> emissions by 2050. The architectural profession also emphasised its central role in planning and designing sustainable, resilient, carbon-neutral and healthy built environments.

By supporting this initiative, the *Kamra tal-Periti*, along with all signatories, committed to promote the following actions:

- *Plan and design cities, towns, urban developments and new buildings to be carbon neutral;*
- *Renovate and rehabilitate existing cities, towns, urban redevelopments and buildings to be carbon neutral whilst respecting cultural and heritage values;*
- *In those cases where reaching carbon neutrality is not feasible or practical, plan and design cities, towns, urban developments, new buildings and renovations to be highly efficient with the capability to produce, or import, all of their energy from renewable energy sources in the future;*
- *Engage in research and setting targets towards meeting the 2050 goal;*
- *Advocate and promote socially responsible architecture for the community, develop and deliver equitable access to the information and tools to deliver these objectives.*

These targets should be integrated within the National Strategy for the Environment, and undertaken in parallel with it.

The National Strategy should also be aligned with the UN's Sustainable Development Goals – anything short of this would be a futile attempt at achieving a sustainable quality of life.

In addition, the following parallel developments should be undertaken:

- Enshrining the right to a healthy environment in the Constitution;
- The proper costing of environmental capital replacing the standard cost-benefit approach to any development (especially infrastructure);
- Formulation of a National Landscape Policy;
- Formulation of a National Policy for Architecture;
- Integration of sectoral policies driven by effective planning;
- Effective institutional set up;

- Consistent discourse and action, in line with sustainable development principles (which can only be achieved through the last two above points);
- Stronger legal structures to curb actions that harm the environment and in turn impact public health, including criminal action.

## **5. What are in your opinion Malta's main environmental challenges in the next 30 years?**

The following is a non-exhaustive list of what, in the *Kamra's* opinion, are the main environmental challenges Malta will be facing in the next 30 years:

1. Achieving an across the board mind-set for a complete cultural and institutional commitment to a better environment, and for the prioritisation of the environment above any more expedient, even if more politically desirable, goals;
2. Institutional capacity, institutional conflict, and remit, and the inability or unwillingness of institutions to appreciate the economic and cultural import of heritage and environment assets for the advancement of society;
3. The quality of the urban realm, including the importance and accessibility of the public realm (public roads, open spaces and gardens within our localities) as environmental assets of value to the community and as an essential contributor to our quality of life, the greening of the urban realm, a significant reduction of traffic volumes and speeds within core areas in order to reassign public space for community interaction, leisure activities and enjoyment;
4. Full protection of the irreplaceable natural landscape;
5. Sustainability of agricultural and fishing activities, and issues relating to food security;
6. Population growth (both permanent and temporary), urban density, and the carrying capacities of our towns and villages;
7. Achieving a sustainable, environment-friendly, energy efficient, multi-modal transport system and its infrastructure, that contributes to rather than detracts from environmental quality, improved convenience for commuters and national economic advancement;
8. Protection (and cleaning) of the sea bed around the islands, and the protection of the natural habitats of the sea;
9. Protection and enhancement of our biodiversity;
10. Reducing noise and air pollution;
11. Effective waste management including effective waste reduction strategies (not burning waste!), obligatory recycling with effective enforcement, stricter procedures (including the use of criminal actions) against perpetrators and recidivists (which in the environmental waste sector are many);
12. Water resources;
13. Valorising natural stone as a rare, unique and cultural asset and resource, its protection and use in sustainable manner.