

To: Hon. Dr Aaron Farrugia, Minister for the Environment, Climate Change & Planning  
Hon. Dr Ian Borg, Minister for Transport, Infrastructure and Capital Projects  
Hon. Dr Jose Herrera, Minister for the National Heritage, the Arts and Local Government

**RE: Construction of Road in Dingli**

Further to our direct action carried out last Friday in Dingli, where Infrastructure Malta turned up with heavy machinery and no warning in its quest to build a road on private property, we would like to refer you to the email we have sent to the Superintendent of Cultural Heritage and to the Executive Council (Planning Authority), dated 5th October 2020, where we are officially requesting an Emergency Conservation Order for the Late Medieval Church of Santa Duminka and its surroundings in Dingli.

We are also requesting that the site is given its deserved Grade 1 Scheduling so as to become a Class A archaeological site, with the inclusion of an appropriate buffer zone. The site in question, without a doubt, deserves the highest level of protection, as well as any adjoining tracts of countryside which are areas of high archaeological sensitivity and therefore should be preserved at all cost.

The Santa Duminka church is in immediate danger as it sits on a site where a new projected road will be developed on agricultural land and which will surround the Santa Duminka church site on two sides, probably causing irreparable harm in the process. This will inevitably result in the structural collapse of the already fragile church, as well as permanently ruin its context.

As per Circular PA3/2020, the road cannot be built because the high level of protection that should be undoubtedly given to such an important building demands that the context of the surrounding area is also maintained and given the highest level of protection.

Numerous questions arise on the necessity for this road. Having been planned since 1998, no action whatsoever had ever been taken to build the road in question. However, it suddenly appears that the road has become so urgently needed that Infrastructure Malta has decided to send workers and machinery to the site without having gone through the motions. Most notably, this government agency has stopped short of following the formal process of officially notifying all the relevant landowners, who will be severely impacted by these works since the road would directly cut across their arable fields. As at the time of writing, Infrastructure Malta has yet to send any official notices or letters to the landowners about its plans for the area.

The road in question would be highly detrimental to the livelihood of several of these farmers, who currently till the land and grow crops, and who have owned this land for many years. The water reservoirs that currently provide much needed water to irrigate these arable fields are also in jeopardy due to this development. The residents of the streets affected, as well as many others in Dingli, have also been very vocal on this issue and have made it clear that this road is neither wanted nor needed.

If this road were to be built, it will surely create pressure for more development in the ODZ areas surrounding the proposed road, as there have already been applications for residences on ODZ in that exact area. Dingli is one of the few remaining rural villages in this country, and the residents want to preserve it as such.

In light of all this, we demand:

- 1) The immediate issue of an Emergency Conservation Order to protect the Late Medieval Church of Santa Duminka and its surroundings. The site should also be given a Grade 1 Scheduling and a status of a Class A archaeological site, including a scheduled buffer zone around it;
  
- 2) A change in the Local Plan so that this road is removed from the plans due to the fact that it is useless and highly damaging to our cultural heritage, our agriculture and our natural environment.

We await your prompt action on this matter, and also to change the plans for the proposed road and ensure the protection of this area while respecting the wishes of the farmers and residents in question, in line with your responsibility as representatives of the people.

*KTanti*

Regards,  
Karen Tanti

Obo Moviment Graffiti and the undersigned concerned farmers and residents of the affected streets.

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