

# DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

## A INTRODUCTION & PURPOSE

This document is submitted to the Gozo Regional Development Authority (GRDA) by Din I-art Helwa Ghawdex (DLHGh) in response to the GRDA's **Gozo Regional Development Strategy - Consultation Document** issued in July 2021.

DLHGh is the recently formed Gozo Branch of Din I-Art Helwa National Trust – see <https://dinlarthelwa.org/>. DLHGh shares the goals and objectives of the parent organisation, but with a very specific focus on Gozo, as indicated in our Mission Statement and Purpose below:

### Mission Statement

- To safeguard Gozo's unique cultural and architectural heritage and its natural environment for future generations.

### Purpose

- Din I-Art Helwa Ghawdex (DLHGh) has been set up as a new Gozo-dedicated arm of the Din I-Art Helwa National Trust
- The DLHGh founding members are a group of Gozitans together with other residents who chose to set up home in Gozo. It welcomes all members of the public who have the interests of the island of Gozo at heart to join the Group.
- The Group is perturbed by the avalanche of construction projects and extreme over-development destroying the centuries-old charm, authenticity and attraction of Gozo's villages and countryside, to the detriment of this and future generations.
- DLHGh will act as a pressure group to bring about strong positive change to planning laws and enforcement and act as a watchdog, lobbying authorities and public for the protection of the landscape and rich architectural legacy of Gozo.
- DLHGh is not an anti-development group. It stands for sustainable development that will create long term employment and business opportunities, enhancing rather than destroying Gozo's heritage.

Accordingly, DLHGh has a close interest in the evolution of the GRDA's Consultation Document into an approved Regional Development Strategy for Gozo and associated Implementation Plan. Accordingly it offers these comments, suggestions and recommendations as part of what we trust will be a constructive and continuing dialogue with the GRDA and other involved stakeholders, with the objective of ensuring that the Development Strategy and Plans for Gozo are fit-for-purpose, realistic, internally consistent and implementable.

# DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

## B OVERVIEW

The **'Regional Development Strategy for Gozo'** issued by the GRDA in July 2021 is a valuable document, indicating clear intent and identifying many excellent initiatives that DLHGh supports. The Vision section (page 8) identifies many of the principles that should shape Gozo's Strategy and Plans for the benefit of Gozo's residents. Perhaps the most important of these is the recognition that Gozo's *distinctiveness* - from both Malta and elsewhere - is its core strength.

Supporting this is the recognition that specific policies should be applied to Gozo that do not necessarily replicate those of the mainland. DLHGh fully support this guiding principle and offers the following observation, which we feel should be embraced in Gozo's Vision, Strategy and Plans:

*"Malta a small City State, while Gozo is still an Island of Villages surrounded by countryside, where the churches are the tallest, most visible buildings on the landscape".*

However, the GRDA's Strategy and Plans need to reflect two global changes that have crystalized over the past 6-12 months, namely:

1. Covid-19 and its variants may be with us for a long time, and this will impact many aspects of life both personal (health, wellbeing, medical, travel, employment, etc.) and economic (including important factors such as travel, tourism).
2. The August 2021 Report from the Intergovernmental Panel on Climate Change (IPCC), which impacts humanity, globally.

These two factors alone require that the GRDA Strategy needs refinement and adjustment to reflect the realities that Gozo and Malta must face. Additionally, DLHGh is suggesting a number of additional actions/measures that would further reinforce the Goals and outcomes of the GRDA Strategy. These and some further suggested refinements are given later in this DLHGh document.

Perhaps the single most important addition that we strongly recommend is that both the Strategy and the Plans include 'space' for Blue Sky Thinking, both in the formation and the implementation of the final GRDA Strategy and Plans. This requirement was repeatedly flagged at the Public Consultation on of the 19 August 2021, together with the recommendation that a specific work stream for such Blue Sky Thinking be established for GRDA's current and ongoing dialogue with the public and other relevant stakeholders and entities.

DLHGh recommends that GRDA implements an explicit methodology defining how the Strategy and Plans, once approved, are baselined, periodically reviewed by some tbd steering committee and when necessary, adjusted within a change management processes. GRDA should apply industry best practices as used for comparable multi-year, multi-project, multi-workstream programmes.

DLHGh recognises that GRDA has a significant challenge in completing this Strategy and Plan and socializing it with key government stakeholders and those entities that will be responsible for implementing their assigned Measures. This process will require further alignment of – and with – those entities owning the Plans. However such 'joined-up planning' should be the goal of every Government department and entity if the Vision for Gozo is ever to be realised.

DLHGh members have already participated in constructive meetings with the GRDA executive, the Minister for Gozo and others. We look forward to continuing dialogue on those and other issues, particularly the key recommendations and suggestions included in this document. We have flagged [\*\*\*] those topics where we believe we can make an important contribution to this throughout our document.

## DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

### C SPECIFIC COMMENTS

#### C0 GRDA VISION

DLHGh has already commended key elements of the Vision, namely Gozo's distinctiveness and the fact that specific policies should be applied to Gozo. Additionally we strongly endorse the principles and goals in the Vision section, including:

- sustainable development that does not come at the high expense of natural and cultural resources;
- special planning and development that preserve Gozo's ecological and cultural characteristics;
- wealth creation for Gozo's residents, while safeguarding the interests of future generations;
- economic growth that also offer a high level of quality of life
- Identifying, supporting and incentivising activities that support the above.

Returning to the theme of Gozo's *distinctiveness*: Its special, uniquely charming qualities draw people from all over the world. Many have come here and made Gozo their home – even when they could have lived anywhere else on the planet. Thousands of Gozitans who emigrate overseas eventually return to Gozo. Maltese also appreciate Gozo's distinct character - they feel it as soon as they get off the boat. Many have also made it their second home, and many aspire to make it their first, because it is different to Malta, and because it embodies many social and aesthetic values that have been lost in Malta.

The identity of Gozo is based on its villages' communities, parish life, football clubs and traditional farming in their surroundings. This is another fundamental difference from Malta, with its very large areas of continuous urban landscape and its higher density of population. Gozo has been fortunate in that it has so far avoided most of the ravages that today plague Malta: high-rise buildings, ribbon development, and the lack of access to nature, countryside and fresh air.

DLHGh recommends that a village-centric approach should be a key focus for a definition of differentiated policies and a specific approach for Gozo. This principle should be reflected elsewhere in the GRDA Strategy and Plans, as commented on later in our document..

Wealth creation and better quality of life and services are fair aspirations for all Gozo's residents. Infrastructure and targeted investment are needed but the red line should be the destruction of villages, their communities and the rural landscape that supports them. The Consultation Document has barely a mention (perhaps only one) to Urban Conservation Areas (UCA) and very few references to villages beyond the 'village square' (cf. Measure M7.15). The very large percentage of Gozo's residents live in villages, but not in the village squares.

This emphasis on 'the village' is absent in from GRDA's Consultation Document so that it lacks a common thread and a clear concept for Gozo to articulate Strategy and Plans beyond development considerations.

A final general comment: the GRDA's Consultation Document makes very little reference to widely-held concerns about "overdevelopment" in Gozo, and the flawed or otherwise inappropriate policies and decisions made by Malta's Planning Authority. This issue has been raised recently and repeatedly by many public and community stakeholders in Gozo, including: the Gozo Mayors (collectively), the Gozo NGO Association, Wirt Ghawdex, Ghawdex and many others. These issues were well-outlined in two pages in the "*Note on the Construction and Real Estate Development in Gozo*" authored by Mr. Mario Borg, CEO GRDA around April 2021.

## DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

### C1 DETAILED COMMENTS: PRIORITY AREA 1 – SPATIAL PLANNING & SUSTAINABLE URBAN DEVELOPMENT

As currently expressed, the Goals make no specific reference to the villages or ‘urban communities’, nor to the coastline. The reference to ‘open spaces’ is positive, but this should be taken further to include nature and other parks, designated rural walks and heritage tours and the like. See further references to this under Priority Area 7.

Additionally the final Goal listed re ‘*planning and building a sustainable environment....etc.*’ should also reference the necessary contribution of these to ‘*quality of life*’.

However the ‘elephant in the room’ is the Planning Authority’s planning policies as are current being executed, an issue that is not mentioned directly in the GRDA Consultation Document. That is key policy area requiring change for Gozo. This change is anticipated in the GRDA’s Vision section earlier, and the specific reference to specific policies for Gozo, different from the mainland. This is a key factor that will help to maintain Gozo’s distinctiveness.

DLHGh has provided in Section D of this document three Priority Recommendations that directly address Priority Area 1 - Spatial Planning and Sustainable Urban Development, together with a further set of fourteen Recommendations (see Section F), many of which directly support or complement those Priority Recommendations.[\*\*\*]

DLHGh broadly supports the following Measures: M1.1, M1.3, M1.4, M1.5, , M1.7, M1.8, M1.9, M1.10 and M1.12, with the qualifications and our other comments given directly below:

**M1.1 Regeneration of Low-End Real Estate:** Our concern here is that pushing real estate into the medium/higher end can reduce the number of lower-priced properties and as such out-price them for certain sectors of people. Housing needs to be balanced/affordable and suitable quality. It needs to be mixed tenure developments to create communities. So while it is commendable to upgrade properties, care must be taken not to eliminate the opportunity for lower priced housing, especially for first time buyers.

**M1.2: We do not need more car parks in Victoria:** it puts more cars on the roads and increases congestion. Less car parks, less cars will significantly reduce emissions, given that cars are major contributor, together with heavy plant/construction equipment. However, a case can be made for a new multi-storey underground car park in the limits of Victoria and used to increase pedestrianised and green areas, remove off-street parking and cars in the centre of Victoria.

**M1.3: Family parks are good but insufficient.** Gozo has no nature parks and we strongly support the Heritage Parks Federation initiative to create a 100 hectares nature park at Ta Soppu in Nadur. See comments in Section C7 later.

**M1.5 Green Buildings:** This needs to be introduced into Planning/Design Policies so that each new development has to achieve a certain percentage of renewable energy from the outset.

**M1.6 re Polluting Vehicles:** The proposed ‘three-tier approach’ is very indirect. More direct ways are needed to tackle this very important issue, which has a major impact on health (pollution from exhaust), as well as traffic congestion and road surfaces. These more effective ways include: proper enforcement by Police and/or Local Wardens on exhaust-emitting vehicles; reintroduction of the scheme of public reporting via SMS but coupled with follow-up action; and stricter controls on VRT stations, which appear to be passing these vehicles as ‘road-worthy’.

## DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

M1.9 Regenerating Victoria: It is not just a matter of ‘renew’; rather this should be a major restoration project, which is a more sustainable form of urban renewal.

M1.11. Design to context: this measure as stated is totally inadequate. ‘*Design to context*’ is not addressed merely in ‘*finishes and facades*’. This measure is current too weak to address the present situation typically described as ‘overdevelopment’, and which represents a critical issue in the visual identity of Gozo’s villages. Gozo needs a full – and if necessary, new – set of mandatory architecture and design guidelines to maintain the appearance of Gozo’s villages, including: height restrictions; Annex 2 withdrawal; UCA extension; protection of ODZ; and non-traditional material on facades. DLHGh has provided specific recommendations as these matters in Sections E and F. [\*\*\*]

Finally, there is no mention in this Priority Area of ‘solar rights’, which along with the light pollution guidelines would benefit the planet, humans and local wildlife. See <https://era.org.mt/wp-content/uploads/2020/06/Guidelines-for-the-Reduction-of-Light-Pollution-in-the-MI-PC-Draft.pdf>.

### C2 DETAILED COMMENTS: PRIORITY AREA 2 - INFRASTRUCTURE AND ACCESSIBILITY

DLHGh broadly supports the Goals as given in this section. We also support the following Measures: M2.1, M2.2, M2.3, M2.5, M2.6, and M2.7.

Additionally, please note the following comments:

Measure 2.2 Environmentally Friendly Airstrip: We assume this will remain on the same footprint as the current facility. Additionally we suggest that microlight operators could easily use the airstrip – a potential niche tourism market, as currently all flights must originate from Luqa.

Measure M2.4 Mgarr Harbour Expansion: while this is necessary, such expansion should not extend to accommodating cruise ships as this is not environmentally sustainable. Cruise ships are extremely polluting and offer little benefit to the local economy. Passengers spend very little money on the island and yet have a major impact on the local infrastructure.

Measure M2.5 Comino Conservation: This sounds like ‘green washing’. The island is already a Natura 2000 site in crisis, as one can readily see from very recent reporting on road construction and the deck-chair invasion of available beach space at the Blue Lagoon. The new hotel sounds promising and has good ‘messaging’, but will nevertheless consume land and take more for solar panels. Comino has great potential and a unique heritage: it could serve as a research base for the conservation/research of indigenous Maltese flora and fauna, for example the Maltese honey bee where Comino could have an important role as a bee /pollinator reserve.

Measure 2.8 Alternative Road to Mgarr: While we support the Victoria ring road, we oppose the alternative road to Mgarr if this alternative is a tunnel under the Fort Chambray area.

Finally, while there is a passing reference in the Background section (page 6) of the Consultation Document to the ‘*planned undersea tunnel*’ between Malta and Gozo, this topic is not mentioned again. DLHGh has a number of concerns on the Tunnel around the following issues:

- Maturity of Project Definition
- Design & Compliance
- Project Risk & Lifecycle Costs
- Alignment with other National Strategies

## **DLHGħ COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY**

### **C3 DETAILED COMMENTS: PRIORITY AREA 3 – ECONOMIC AND TALENT DEVELOPMENT**

DLHGħ broadly supports the Goals and Measure given here, and we agree wealth creation and quality of life are very important to the residents of Gozo, so Gozo's economic development strategy should support both.

### **C4 DETAILED COMMENTS: PRIORITY AREA 4 – NEW ECONOMY**

DLHGħ broadly supports the Goals and Measures in this Priority Area.

However we believe that this Priority Area needs to be augmented by further 'blue sky thinking' to explore new strategy and economic models for the Island, not least because of the global impact of Climate Change and the potentially continuing Covid-19 epidemic. Some of these possible '*alternative models for Gozo*' were mentioned at the interesting Public Consultation Meeting on 19 August 2021. These included making the whole island of Gozo a 'global model' for: marine research; a green economy; energy self-sufficiency; exclusively serviced by e-vehicle transportation; and others.

Any one of the above would also define what would be a primary target for 're-skilling' Gozo's labour force, possibly directing it away from its current reliance on essentially 'indiscriminate' tourism (with no clear focus) and construction into entirely new areas. This would in turn inform the Measures to be included in Priority Area 4, as well as some of them in Priority Area 3.

Additionally, we believe that Measure 4.2 Addressing the Digital Skills Gap needs also to be supported by measures around improving literacy, reading for pleasure (embedded skills) and online learning, particularly in a Covid-19 or post-Covid environment, since digital skills still require the ability to read.

### **C5 DETAILED COMMENTS: PRIORITY AREA 5 – SUSTAINABLE TOURISM**

DLHGħ broadly supports the Goals and measures in this Priority Area 5, and adds the following specific comments, suggestions and recommendations:

M5.2 Service Excellent programme: In our view this will not be achieved unless the wages are in line with other jobs. Very few local Gozitans currently want to be in this sector.

M5.3 Gozo's Unique Traditional and Rural Charm: while agreeing, the measure should also embrace the charm of Gozo's villages.

M5.7: DLHGħ has a number of very specific Suggestions/Recommendations here, which we summarise below [\*\*\*]:

Establish and open national park at Ta Sopu for the benefits of the Gozitan community and as an attraction of niche tourism around open green spaces, as well as dark sky observations, rock climbing and other similar outdoor activities.

## DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

Include under Priority Area 5 the archeological/megalithic and fortification heritage of Gozo DLHGh recommends to optimise potential for tourism of the dense network of fortifications on the island. Coastal towers and citadel are a very rich heritage 'package' for such a small island: we should create a Coast Towers trail and park.

Gozo should exploit its archeological heritage beyond Ggantija. This and similar topics should be addressed with Heritage Malta, note that the new Gozo Museum is planned to open next year and it should be an excellent resource/events centre.

There are good opportunities around green /agro tourism (as long as this is not an excuse to build on ODZ) e.g. slow food (<https://www.slowfood.com/>), organic farming, farm to fork etc. However we have the impression that current systems and standards are complicated and uneconomic.

Other activities should be identified and probably included in the niche tourism initiatives, such as geocaching (<https://en.wikipedia.org/wiki/Geocaching>): learning holidays; summer study holidays (not just learning English language); WOOFING (<https://woof.net/>); heritage and arts-based tourism; baroque music festivals; book/poetry/literary festivals, etc..

Additionally the 2031 European capital of culture could provide several additional areas of cultural tourism development to be put in place between now and then - see [https://www.vca.gov.mt/en/opportunities/european-capital-of-culture-2031-\(malta\)\)](https://www.vca.gov.mt/en/opportunities/european-capital-of-culture-2031-(malta)))

### C6 DETAILED COMMENTS: PRIORITY AREA 6 – SOCIAL DEVELOPMENT

DLHGh broadly support the introduction, Goals and Measures given in this Priority Area.

However, there remains here – as elsewhere in the Consultation Document – a serious omission, namely: an adequate reference to “villages” as a key pillar to Gozitan social life. Social development needs to be articulated within the context of having the village at its core.

Accordingly, DLHGh strongly recommends that included in the Social Development Goals is a statement around ‘*Developing Community Involvement and Village/Neighbourhood Plans*’, where decisions are made at the local level to benefit the local community. This recommendation is addressed in the DLHGh Recommendations in Section F [\*\*\*]

M6.3 Migrant Assimilation Programmes and an Integration Hub are valuable measures that we support. These could both be supported – or even realized - though a new fit-for-purpose central public library that could serve the needs of both the Gozitan/visitor/migrant/refugee community and host a wide range of other learning and cultural activities such as: language learning, citizenship courses, free internet access, parent/carer/children’s activities, as well as an intergenerational learning space. Some examples include <https://humanlibrary.org/> and <https://www.cilip.org.uk/news/482799/Welcoming-Refugees-to-the-UK-and-to-Libraries.htm>

However, DLHGh also comments that there is no mention of physical and mental health needs, mindfulness and the benefits of being outdoors and having access to countryside, growing your own produce/ green spaces, etc. (see #everyoneneedsnature).

## DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

### C7 DETAILED COMMENTS: PRIORITY AREA 7 – RURAL DEVELOPMENT AND ECO-GOZO

DLHGh strongly recommends that the overarching issue of Global Warming needs to be elevated to a primary Goal, even noting the fourth Goal given in the Consultation Document for *'R&I to counter Climate Change through technological development'*. A global issue such as global Warming should be a vital driver to the whole GRDA Strategy. This goes back to the imperative for further 'blue sky thinking' to modify or even re-direct the Strategy [\*\*\*].

DLHGh considers the section on Priority Area 7 to be rather light on substance when it comes to nature and almost completely silent on 'the sea' – other than a reference to Upgrading Beaches. "The sea" in particular is a gap that needs to be filled, probably through further 'blue sky thinking'. [\*\*\*]

While Measures 7.2 through 7.9 around farming improvement are positive there remain critical issues around the necessary changes to government policies and recommendations (see <https://lovinmalta.com/opinion/analysis/saving-farmland-requires-sweeping-regulatory-and-policy-change-by-maltese-government/>).

DLHGh suggests that new ways of thinking are regarding current agricultural methods as food security and climate change are already impacting food production and crops. The Government's Experimental Farm in Xewkija has an important role. Other systems need to be piloted/extended - such as organic growing, low water use systems and permaculture projects (which are already working successfully if on a small scale, here on Gozo) – for example <https://www.thrivemalta.com/thrivegardensgozo> and <https://www.soilassociation.org/causes-campaigns/a-ten-year-transition-to-agroecology/what-is-agroecology/>. [\*\*\*]

Additionally M7.6 New Water for Gozitan Farmers should also address the specific issue of Gozo's water table, and in particular, control of illegal bore holes.

M7.12 Natura 2000 Terrestrial Sites Action Plan: In DLHGh view this measure as stated is extremely weak regarding *"Safeguard Nature 2000 sites"*. EU requirements specify that Natura 2000 areas must be managed and receive adequate investment to improve their quality. This area must be addressed together with the ERA as it is a must-do for nature and environment. Typically Natura 2000 sites include one or more of: afforestation with local species; removal of alien species; removal of derelict infrastructures.

M7.13 Afforestation Programme – DLHGh view is that the central issue here is not so much about planting new trees, but looking after the ones that Gozo already has. Planting trees on an island this size is welcome, but emission reductions are the starting point to tackling the climate change crisis – see <https://www.sciencenews.org/article/planting-trees-climate-change-carbon-capture-deforestation>. This is another area where Gozo-specific actions at the village level actions would pay dividends. [\*\*\*]

M7.14 Restoration of the Gozo Aqueduct is a good project - at some point - but better promotion /tours of the already restored water system at the source would pay more dividends in terms of niche tourist visits.

M7.15 Regeneration of Gozitan Pijazzas and Squares: DLHGh supports this measure, but also recommends that immediate attention be given to other core village areas, since this is where much of the Gozitan community live. [\*\*\*]



## DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY

M7.16 Piloting Sustainable Villages: DLHGh supports this measure, and recommends that it could be coupled – both in piloting and subsequent implementation - with its other recommendations on Local/Neighbourhood Planning as given in Section F. [\*\*\*]

DHGh also strongly recommends that further Measures be included in Priority Area 7, as outlined immediately below, all of which would greatly benefit from further ‘blue sky thinking’ in a open, public forum:

Gozo is – or could be – an eco-Island but currently has no nature park. DLHGh strongly supports the Heritage Parks Federation (HPF) work to establish Gozo’s first Nature Park at Ta Soppu in Nadur, to be managed by HPF – also see <https://maltacvs.org/voluntary/the-heritage-parks-federation/>

This park will extend to c. 100 hectares or roughly 1.5% of Gozo landmass, and represent a significant addition to quality of life in Gozo, as well as the potential for tourism. This initiative is already advanced, as evidenced by ongoing discussion with the GRDA CEO and the Minister for Gozo. [\*\*\*]

Gozo's ‘other’ citadel – Fort Chambray - has massive potential but requires action. The site could be further developed showcasing good design and car-free eco-housing with excellent connectivity to Malta. The unique heritage buildings on site could have many potential arts/cultural/ community uses and could be used to create Gozo’s first ‘Parador’ style 5 star eco hotel etc. . <https://en.wikipedia.org/wiki/Parador>.

Gozo’s Ramla Valley is our only green valley including a dune/sandy beach. DLHGh recommends that immediate consideration be given to maintaining Ramla Valley as a eco/green environment free of residential development with emphasis on traditional farming, wine production and conservation of dune environment. It may be appropriate that this Ramla Valley Site be managed by the Heritage Parks Federation.[\*\*\*]

Another measure that needs to be added is one that directly addresses Gozo’s coastal zones. As nature Trust Malta FEE state: ‘*Most of the areas of ecological importance in the Maltese Islands are actually concentrated around the coastal zone*’ – see <https://naturetrustmalta.org/>. [\*\*\*]

Finally, the Consultation Document currently has little (if any) reference to the Gozo’s natural sea potential or associated opportunities such as marine reserves, oceanographic research and the like – see this any other sites: <https://timesofmalta.com/articles/view/malta-to-get-first-ever-marine-park-in-nature-trust-mta-collaboration.878348> [\*\*\*]

### **C8 DETAILED COMMENTS: PRIORITY AREA 8 – CULTURE, HERITAGE AND ARTS**

DLHGh broadly supports the Goals and Measure in this Priority Area although once again we strongly suggest that Culture and Heritage should also include Gozo’s villages (specifically the village cores) so that the visual identity of villages be maintained.

Moreover this Action Area makes no reference to Gozo’s heritage of fortifications. DLH will restore Qbajjar tower but additionally the network of towers and citadel should be managed holistically as a unified concept. We suggest that the management of towers should fall under one entity with support from a ‘Friends of Gozo Towers’ group or similar.

## **DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY**

Additionally there is little or reference to Gozo's Megalithic/Bronze Age, which as well as being an important part of Gozo's heritage, is also a niche tourism opportunity. It is to Gozo that Malta's first settlers came some 8,000 years ago: see <https://timesofmalta.com/articles/view/700-years-added-to-maltas-history.673498> .

M8.4 Bequeathing Gozo to Future Generations. DLHGh whole-heartedly supports the intent of measure. However for this goal to be achieved the Gozo-specific planning policies need to be established and implemented rigorously, including enforcement where necessary.

M 8.6 Strengthening the Voluntary Sector: Setting up a single Volunteer Information point would be helpful, since there are so many current/potential opportunities, but it is difficult to find out where, when and what's involved. The initiative could also engage with business community for workforce volunteering and regular/ annual events such as MADD (make-a-difference-day) and through citizen science projects etc. A diverse and motivated volunteer force would be important factor in the success of delivering events on Gozo ahead of, and during, the European capital of culture bid - see <https://valletta2018.org/cultural-programme/tal-kultura-volunteer-programme/>.

## **DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY**

### **D DLHGh – PRIORITY RECOMMENDATIONS**

DLHGh believes that without immediate positive action the island will be lost forever and is calling on Government and the Planning Authority to implement, with immediate effect, three core requests to give the island of Gozo breathing space until the present Planning guidelines are reviewed and strengthened – and where necessary, adjusted in their application to Gozo - in liaison with NGOs and public.

1. A twelve-month moratorium period on all ODZ development applications for residential and industrial use, with some exceptions for genuine agricultural applications up to 12 square metres.
2. A twelve-month extension of the current UCA boundaries by 250 metres to create a new buffer zone enjoying the same level of protection as UCA until new guidelines can be approved.
3. A twelve-month suspension of DC2015 Annex 2 regulations for the island of Gozo.

### **E DLHGh - FURTHER RECOMMENDATIONS**

#### **Medium Term Goals and Associated Recommendations**

DLHGh is requesting the authorities to consider longer-term action in the following areas (the numbering below is for reference purposes only and has no particular significance) :

##### *1. Safeguard the ODZ*

- Implement changes to planning laws to safeguard ODZ and remove loopholes.
- Strengthen the planning and enforcement teams with independent officials committed to sustainable planning and free of any bias or conflicts of interest.
- Investigate all cases of decisions granted for agricultural reasons on ODZ land, such as stores and water reservoirs, to ensure they are being used for the original stated purpose, and take proper forceful action where deviations exist.
- Government roadworks and other infrastructural works impacting ODZ land to go through full EIA and not to commence until development approvals are in hand.
- Impose EIA together with photomontages and visuals for any developments over 2 storeys in the vicinity of ODZ and scheduled buildings.

##### *2. Protect village core features*

- Permanent suspension of Annex 2 for UCA and sensitive sites.
- Permanent extension of the UCA boundaries.
- Impose physical site visits on all development applications within UCA.
- Ensure that all enforcement is carried out by independent parties free of any bias.

##### *3. Cultural Heritage Act and scheduled properties*

- Define Heritage as per the Cultural Heritage Act of a building or site over 50 years old.
- Impose strict adherence to the new guidelines published by the relevant ministry to protect all scheduled buildings and their immediate environment.

## **DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY**

### *4. Scheduling of vistas and skylines*

- Introduce scheduling of viewpoints of historic and village skylines and impose requirement for photomontages for any development proposals impacting skylines.

### *5. Historic alleyways*

- Protect all historic alleyways (*sqaqien*) by prohibiting permitted road widening projects from taking place in such alleyways.

### *6. Facades*

- Until revised architectural guidelines have been established for Gozo, ban the use of bricks and modern external coating on all street facades.

### *7. Local Councils and Community Involvement in planning approvals*

- Make Local Councils an obligatory consultee in the application process for any new applications in their locality.
- Make the local communities an obligatory consultee in the application process for any major development proposal in their locality.
- Establish the way the Planning Authority will interact with Local Councils to involve the local community, other stakeholders and statutory bodies in preparing Local Plans.

### *8. Gozo Housing Needs Assessment*

- In consultation with Local Councils, commence and complete as soon as practical a Housing Needs Assessment with a 5-10 year planning horizon.
- This will include a survey to ascertain what housing stock is presently available in Gozo, including current vacant housing stock, and to assess the local community's medium term future needs, specific to each village/area.
- This survey should include a projection of the housing required to accommodate expected households during the plan period for each residential structure: single family, sole occupant, multi-family, special needs, holiday accommodation and other classes of need.
- This survey should also identify current and 'capacity' housing density, land availability within Development Zones, as well as the potential use of brownfield sites.

### *9. Gozo Heritage Study and Streetscape Analysis*

- Undertake a full Heritage Study/Streetscape analysis to be carried out by qualified heritage architects, architectural historians and archaeologists where necessary.
- The study should cover all localities and streets in Gozo, emulating similar studies carried out in various countries, identifying which buildings are of significance, the level of significance and whether worthy of protection.
- The outcome, which will carry a grading for any building of any significance, will become a reference document for planners, architects and the public, with the higher levels of heritage significance being recommended for inclusion as scheduled properties, thereby being afforded higher levels of protection.

## **DLHGh COMMENTS ON THE GOZO REGIONAL DEVELOPMENT STRATEGY**

### *10. Architectural Standards and Public Education*

- Improve Standards of architectural design and execution
- Educate the public in general and the young in particular about the importance of Gozo's cultural heritage.

### *11. Nature Park for Gozo*

- Approve and further support the Heritage Parks Federation (HLP) proposal for the implementation of a Nature Park for Gozo Ta Soppu in Nadur.

### *12. Fiscal Incentives*

- Reduce stamp duty on purchases of vernacular buildings and all UCA properties to 0.5%, on condition that the intrinsic nature of the building is respected and no additional floors are added on to building.
- Introduce new restoration funding for all Gozo UCA properties, farmhouses and houses of character with guidelines on maximum permissible height.
- Suspend the stamp duty subsidy presently applicable up to 31 December 2021 on purchase of apartments, penthouses and apartments in new apartment blocks built for profit and speculative purposes, on the principle that taxpayers should not subsidize professional developers enjoying hefty profit margins.

### *13. Economic Growth*

- Introduce financial stimulus packages to promote sustainable economic growth in Gozo, including a re-focus on Eco-Gozo.
- Promote high-end sustainable tourism in smaller high quality boutique hotels set in authentic village core Gozo and in existing farmhouses and houses of character.
- Encourage high value added, low environmental impact business such as digital, media and renewable energy organisations to relocate to Gozo.

### *14. Global Marketing*

- Initiate a global marketing campaign to attract to Gozo affluent high end eco-tourists and a new and fast increasing breed of post COVID-19 affluent 'work-from-home' global professionals to set up home office in 'authentic' Gozo together with their families.

## **F CLOSING COMMENTS**

DLHGh commends the Gozo Regional Development Authority for this whole initiative and the good work done to date.

We look forward to continuing dialogue with the GRDA and other stakeholders where it is contributing to 'positive change', including further discussions on those points in this document marked [\*\*\*].

**End**

*Submitted to GRDA on 31 August 2021*