

*2<sup>nd</sup>. Draft*

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**Gozo and Comino Local Plan**

# **INCEPTION REPORT**

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**Planning Authority**

# CONTENTS

## TITLE

<b>1.</b>	<b>PREAMBLE</b>
1.1	Background
1.2	The Inception Report - Purpose
1.3	Structure of the Inception Report
<b>2.</b>	<b>INTRODUCTION</b>
<b>2.1</b>	<b>General Physiography</b>
2.1.1	Background
2.1.2	Coastal Areas
2.1.3	Inland Areas
<b>2.2</b>	<b>Climate</b>
2.2.1	Introduction
2.2.2	Rainfall
2.2.3	Humidity
2.2.4	Wind
2.2.5	Sea Temperatures
<b>2.3</b>	<b>Natural Environment – General</b>
2.3.1	Introduction
2.3.2	Geology
2.3.3.	Ecology
<b>2.4</b>	<b>Man-Made Environment – General</b>
2.4.1	General
2.4.2	The Gozitan Skyline
2.4.3	Planimetry
2.4.4	Industry
2.4.5	Agriculture
2.4.6	Rural Settlements
2.4.7	Quarries
<b>2.5</b>	<b>Summary</b>
<b>3.</b>	<b>SOCIO-E CONOMIC CONSIDERATIONS</b>
<b>3.1</b>	<b>Introduction</b>
<b>3.2</b>	<b>Demography</b>
3.2.1	General
3.2.2	Population Changes
3.2.3	Population Density
3.2.4	Population Structure
3.2.5	Household Size
3.2.6	Migration

<b>3.3</b>	<b>Economy</b>
3.3.1	Introduction
3.3.2	Employment
<b>3.4</b>	<b>Cultural Issues</b>
3.4.1	General
3.4.2	Context
<b>3.5</b>	<b>Land Ownership</b>
<b>3.6</b>	<b>Planning and Gozo</b>
3.6.1	Introduction
3.6.2	Planning Permission
3.6.3	Enforcement
<b>3.7</b>	<b>Socio-economic Implications</b>
<b>4.</b>	<b>SETTLEMENTS</b>
<b>4.1</b>	<b>Introduction</b>
4.1.1	Outline
4.1.2	General Planimetry
4.1.3	Rabat / Fontana and Kerzem
<b>4.2</b>	<b>Policy Context</b>
<b>4.3</b>	<b>Built Urban Spaces</b>
4.3.1	Ribbon Development
4.3.2	Consequences of Ribbon Development
4.3.3	New Development on Bays and Ridges
4.3.4	Marsalforn and Xlendi
4.3.5	Ridge Edge Modern Development
4.3.6	Public Housing
<b>4.4</b>	<b>Urban Open Spaces</b>
4.4.1	General Characteristics
4.4.2	Morphology
4.4.3	Problems of Public Open Spaces
4.4.4	Green Amenity in Urban Open Spaces
<b>4.5</b>	<b>Promenades</b>
4.5.1	Importance of Promenades
4.5.2	Overview
<b>4.6</b>	<b>Policy Approach</b>
4.6.1	General
4.6.2	Outline Scenarios
4.6.3	Objectives
<b>5.</b>	<b>HOUSING</b>
<b>5.1</b>	<b>General Situation</b>
<b>5.2</b>	<b>Policy Context</b>
5.2.1	General Policies
5.2.2	Specific Policies on Housing

<b>5.3</b>	<b>Issues</b>
5.3.1	General
5.3.2	Land Availability
5.3.3	Availability of the Current Housing Stock
5.3.4	Housing Condition
5.3.5	The Housing Quality Survey
5.3.6	Housing Tenure
5.3.7	Social Housing
5.3.8	Property Acquisitions by Foreigners
<b>5.4</b>	<b>Policy Approach</b>
5.4.1	General
5.4.2	Scenarios
5.4.3	Objectives and Strategy
<b>6.</b>	<b>TRANSPORT</b>
<b>6.1</b>	<b>General Situation</b>
6.1.1	Transport to Gozo
6.1.2	Public Transport (Land Based)
6.1.3	Private Transport
<b>6.2</b>	<b>Policy Considerations</b>
6.2.1	Strategic Background
6.2.2	Structure Plan Policies
6.2.3	Commuted Parking Payment Scheme
6.2.4	Traffic Calming Guidelines
<b>6.3</b>	<b>Issues Relevant to Local Plan Area (Transport in Gozo)</b>
6.3.1	Introduction
6.3.2	Traffic in Rabat
6.3.3	Marsalforn
6.3.4	Xlendi / Fontana
<b>6.4</b>	<b>Issues Relevant to Local Plan Area (Inter-Island Transport)</b>
6.4.1	Introduction
6.4.2	Sea Transport
6.4.3	Air Transport
6.4.4	Direct Link
6.4.5	Comino
<b>6.5</b>	<b>Policy Approach</b>
6.5.1	General
6.5.2	Outline Scenarios
6.5.3	Strategy
<b>7.</b>	<b>SOCIAL AND COMMUNITY FACILITIES</b>
<b>7.1</b>	<b>Introduction</b>
<b>7.2</b>	<b>Policy Background</b>
<b>7.3</b>	<b>Education</b>

- 7.3.1 Background
- 7.3.2 Existing Infrastructure
- 7.3.3 Issues
- 7.4 Health
  - 7.4.1 Background
  - 7.4.2 Existing Infrastructure
  - 7.4.3 Issues
- 7.5 Elderly
- 7.6 Special Needs
- 7.7 Social Amenities
- 7.8 Settlement Community Facilities
  - 7.8.1 Administration related buildings
  - 7.8.2 Local Councils
  - 7.8.3 Church related
  - 7.8.4 Places of Assembly
- 7.9 Policy Approach
  - 7.9.1 General
  - 7.9.2 General Scenarios
  - 7.9.3 Education - Objectives and Strategy
  - 7.9.4 Health - Objectives and Strategy
  - 7.9.5 Elderly and Special Needs – Objectives and Strategy

## **8. UTILITIES AND SERVICES**

- 8.1 Introduction**
- 8.2 Policy Background**
- 8.3 Electricity**
  - 8.3.1 Generation
  - 8.3.2 Distribution
  - 8.3.3 Supply and Demand
- 8.4 Water**
  - 8.4.1 Collection
  - 8.4.2 Extraction
  - 8.4.3 Storage
  - 8.4.4 Distribution
  - 8.4.5 Supply and Demand
- 8.5 Fuel**
  - 8.5.1 Use
  - 8.5.2 Storage
  - 8.5.3 Supply and Demand
- 8.6 Telecomms**
  - 8.6.1 Background
  - 8.6.2 Telephony
  - 8.6.3 Television
  - 8.6.4 Radio Communication
  - 8.6.5 Data Links

8.6.6	Supply and Demand
<b>8.7</b>	<b>Sewerage</b>
8.7.1	Sewerage Network
8.7.2	Sewage Treatment
8.7.3	Coping with Demand
<b>8.8</b>	<b>Solid Waste</b>
8.8.1	Waste Generation
8.8.2	Waste Collection
8.8.3	Waste Disposal
<b>8.9</b>	<b>Security Infrastructure</b>
<b>8.10</b>	<b>Policy Approach</b>
8.10.1	Introduction
8.10.2	Outline Scenarios
8.10.3	Objectives and Strategy
<b>9.</b>	<b>Commerce and Industry</b>
<b>9.1</b>	<b>Introduction</b>
<b>9.2</b>	<b>Policy Context</b>
<b>9.3</b>	<b>Retail</b>
9.3.1	Introduction
9.3.2	Food and Non-food shopping
9.3.3	Retail Issues
<b>9.4</b>	<b>Offices</b>
<b>9.5</b>	<b>Manufacturing Industry</b>
<b>9.6</b>	<b>Small and Medium Enterprises (SME's)</b>
<b>9.7</b>	<b>Construction related Industry</b>
9.7.1	Introduction
9.7.2	Extractive Industries
9.7.3	Other Construction related Industries
<b>9.8</b>	<b>Policy Approach</b>
9.8.1	Introduction
9.8.2	Scenarios
9.8.3	Objectives and Strategy
<b>10.</b>	<b>TOURISM &amp; RECREATION</b>
<b>10.1</b>	<b>Introduction</b>
<b>10.2</b>	<b>Tourism</b>
10.2.1	Policy Context
10.2.2	International and Domestic Tourism
10.2.3	Day Visits
10.2.4	Retirement Tourism
<b>10.3</b>	<b>Tourism Policy Approach</b>
10.3.1	Objectives and Strategy
<b>10.4</b>	<b>Recreation</b>
10.4.1	Background

- 10.4.2 Policy Context
- 10.4.3 Formal Recreation
- 10.4.4 Urban Informal Recreation
- 10.4.5 Rural Informal Recreation
- 10.5 Recreation Policy Approach**
- 10.5.1 Objectives and Strategy
  
- 11. Agriculture, Horticulture and Fisheries
- 11.1 Introduction**
- 11.2 Policy Background**
- 11.3 Traditional Cultivation**
- 11.4 Modern Cultivation Methods**
- 11.4.1 Greenhouses and Cloches
- 11.4.2 Agricultural Stores
- 11.4.3 Irrigation
- 11.4.4 Agricultural Access
- 11.4.5 Dereliction
- 11.5 Horticulture**
- 11.6 Animal Husbandry**
- 11.7 Fisheries**
- 11.8 Policy Approach**
- 11.8.1 Objectives and Strategy
  
- 12. URBAN CONSERVATION**
- 12.1 Introduction**
- 12.2 Policy Context**
- 12.2.1 Urban Conservation Areas
- 12.2.2 Listed Buildings
- 12.2.3 Conservation Policies
- 12.2.4 Traffic in UCA's
- 12.2.5 Telecommunications Equipment
- 12.2.6 Promotion
- 12.2.7 Heritage Trust
- 12.2.8 Conservation Pilot Project
- 12.3 Issues**
- 12.3.1 General Situation
- 12.3.2 Planning Issues
- 12.3.3 Urban Regeneration In UCA's
- 12.4 Policy Approach**
- 12.4.1 General
- 12.4.2 Scenarios
- 12.4.3 Objectives and Strategy

<b>13.</b>	<b>RURAL CONSERVATION</b>
13.1	Introduction
13.2	Policy Context
13.2.1	Introduction
13.2.2	RCA Designation
13.2.3	Scenic Value
13.2.4	Agriculture
13.2.5	Ecology
13.2.6	Sandy Beaches and Dune Areas
13.2.7	Rehabilitation of Degraded Habitats and Landscapes
13.2.9	Control of Erosion
13.2.9	Valleys
13.2.10	Trees and Afforestation
13.2.11	Minor Islands
13.2.12	Qawra / Dwejra Area
13.2.13	Education and Research
13.2.14	Archaeology
13.2.15	Marine Conservation Areas
13.2.15	Coastal Zone Management
<b>13.3</b>	<b>Areas and Sites of High Landscape Value</b>
<b>13.4</b>	<b>Areas and Sites of Agricultural Importance</b>
<b>13.5</b>	<b>Areas and Sites of Ecological Importance</b>
<b>13.6</b>	<b>Areas and Sites of Scientific Importance</b>
<b>13.7</b>	<b>Rural Conservation in Gozo</b>
<b>13.8</b>	<b>Marine Conservation Areas</b>
<b>13.9</b>	<b>Policy Approach</b>
13.9.1	General
13.9.2	Scenarios
13.9.3	Objectives and Strategy
<b>14</b>	<b>CONCLUSIONS</b>
<b>14.1</b>	<b>Introduction</b>
<b>14.2</b>	<b>Socio-Economic Context</b>
<b>14.3</b>	<b>Comparison with Mainland Malta</b>
<b>14.4</b>	<b>Strategic Policy Context Compatibility</b>

## APPENDICES

	<b>TITLE</b>	<b>PAGE NUMBER</b>
Appendix A	Climate	
Appendix B	Land Availability	
Appendix C	Utilisation of Dwellings	
Appendix D	Property Values	
Appendix E	Tourism Survey	
Appendix F	Scheduling	

# 1. PREAMBLE

## 1.1 Background

1.1.1 The Gozo and Comino Local Plan is one of the seven local plans envisaged for the Maltese Islands. It is a site specific policy document that is compiled after a very extensive public participation exercise and taking into account the envisaged requirements of a significant number of land and sea users on and around Gozo and Comino. The policy document is based on the strategic direction given by the Structure Plan for the Maltese Islands that sets out the land-use strategy for the country. The Local Plan translates the key directions established by the Structure Plan into greater detail and onto a site-specific framework. Thus the local plan serves both as a tool to further guide land-use planning in the area as well as to direct development control. Further details of the specific terms of reference of a local plan can be found in the Structure Plan for the Maltese Islands **Section 4.5**.

1.1.2 The functions of a local Plan can be summarized as follows:

- a) Application of the strategy of the Structure Plan
- b) Provision of a detailed basis for development control
- c) Providing a basis for promoting and controlling development
- d) Bringing local and detailed planning issues before the public
- e) Definition of special areas where detailed management plans will be drawn up and implemented

1.1.3 In any Local Plan, external consultation and public participation is essential to ensure the success and implementability of the respective plan. Consequently, numerous meetings are held with individuals and agencies ranging from Ministers, parliamentary deputies and local councillors to departments, associations as well as public and private agencies. The outcome of these meetings is minuted, agreed and recorded and many of the issues found in this document can be traced to these meetings. Public participation exercises are also undertaken at various stages of the plan formulation process.

1.1.4 Other important sources of information can be found in documents, reports and other data that is acquired mainly (but not solely) from Public Agencies. The knowledge from these sources is analysed and compiled in a form amenable to Local Planning purposes. In each case, the latest available source of information is used. It is important to note that in some instances, the latest available data sets go back a number of years.

1.1.5 Other information is acquired from the knowledge available within the Planning Authority, literature, the Internet, informal discussion and personal experience.

## **1.2 The Inception Report – Purpose**

1.2.1 The main purposes of this report are to highlight the main issues that underpin land/sea use within the islands of Gozo and Comino and to lay the foundations for subsequent policy formulation. Normally, Inception Reports are supported by a number of reports of survey relevant to the various topics. A number of such reports are being compiled to support the revision of the Structure Plan. It is therefore logical to refer to these reports rather than compile additional technical reports that are bound to contain some repetition. Furthermore, it also makes sense to incorporate supporting data with the Inception Report rather than having to find it elsewhere. Technical information and graphics are therefore being incorporated within this document either within the main body of text or as appendices.

1.2.2 The identification of issues and their basis on sound data is a fundamental pre-requisite for the generation of site specific plans. The report therefore expounds the existing and envisaged situations so that a good basis for the structure of the land/sea use policy document is established together with a reasoned support for the policies and proposals contained therein.

## **1.3 Structure of the Inception Report**

1.3.1 The initial sections of the Report are aimed to expound the background to the situation in Gozo and to highlight the most important strategic issues and their relation to strategic planning guidelines. Subsequently the issues zoom in to a number of topics with island wide relevance.

1.3.2 At the end of each chapter, a policy approach section is dedicated to laying the foundations for site-specific policy formulation. The final chapter summarizes the findings and recommends directions to the policy formulating stage.

## 2. INTRODUCTION

### 2.1 General Physiography

#### 2.1.1 Background

The Island of Gozo lies due NW of the main Island of Malta separated by slightly more than 4 km. of sea with the isle of Comino in between. Gozo occupies a land area of 65.8 km<sup>2</sup> whilst Comino covers an area of only 2.76 Km.<sup>2</sup>. A number of smaller uninhabited islets can be found near the western and southern coast of Gozo and near the western coast of Comino. The coastline of Gozo is around 53 km. long whilst that of Comino is 12.1 km. long. There are no rivers, lakes or mountains in Gozo and Comino. The terrain is generally low hill countryside dominated by flat rocky mesa structures rising to a height of around a hundred metres above sea-level. The highest point occurs at *Ta' Dbiegi* which is 193 m. above mean sea-level whilst the highest point in Comino is 76m. above mean sea-level and occurs on an area known as *Tal-Liebru*. The highest plunging cliffs in the Maltese Islands occur in western Gozo in an area known as *Ras il-Wardija* where cliffs plummet almost vertically to sea-level from an elevation of around 150 m. Although the island of Gozo is so close to Malta, the geomorphology is strikingly different, mainly due to greater preponderance of clay and the greater presence of mesa structures. Furthermore, the gentle SW-NE stratigraphic dip found on mainland Malta, although present, is less evident in Gozo.

#### 2.1.2 Coastal Areas

The south-western, western and north-western coasts are dominated by vertical or almost vertical cliffs which plummet to sea level. This renders access to almost the whole stretch of coast from *Mgarr ix-Xini* going clockwise to *Xwieni* Bay practically inaccessible save for the *Xlendi* Bay area and the *Qawra/Dwejra* area. Subsidence structures can be found in various areas especially in the vicinity of the western coast, the most prominent of which is the *Qawra/Dwejra* complex.

Bays occur mostly on the northern and eastern parts of the southern coastline and are smaller than the bays found on mainland Malta. Sandy beaches are invariably pocket beaches that are a few tens of metres long and a few metres wide. The only substantial sandy beach occurs at *Ramla* and even this is only around 350m. long. The bathymetry and coastal configuration have permitted the construction of one semi-artificial harbour at *Mgarr* in *Ghajnsielem*. Water depths greater than 30 m. can be found in many areas along the south-western, western and north-western coasts of Gozo. Water around Comino is generally less deep although there are a few spots almost adjacent to the coast where water depths reach more than 30 m.

#### 2.1.3 Inland Features

A number of mesa structures consisting of a flat plateau underlain by clay slopes with intervening valleys and agricultural land in between dominate the internal parts of Gozo. A number of pluvial valleys also characterise some of the coastal areas especially due south and west. Most of the built development in Gozo occurs either around formerly agriculturally

dominated plains (eg. *Rabat, Sannat, Xewkija* plains), on top of the mesa structure mentioned earlier (eg. *Cittadella, Zebbug, Xaghra, Nadur*), and near accessible coastal areas (eg. *Xlendi, Marsalforn* and *Ghajnsielem*).

## 2.2 Climate

### 2.2.1 Introduction

The climate in Gozo is typical of the central Mediterranean, characterized by hot dry summers and cool wet winters. The air temperatures vary on absolute terms from a few degrees above 0°C on the coldest dawns to more than 40 °C on the hottest summer afternoons. More normally, winter night temperatures hover around 10 °C whilst maximum summer temperatures reach a few degrees above 30 °C. Solar intensity in the summer months is very high, this being due to the high solar elevation and the virtual absence of clouds. The rapid fading of exposed pigments (eg. in road-signs and adverts), the fading of wood-polish and wood stain and the peeling of paints are also evidencing the high solar intensity. It is also responsible for considerable heat gain from the flat roof structures that dominate local construction as well as considerable thermal movement within the same structures. However the hot summer months are attractive to individuals who seek warmer climates, brighter skies, water-related opportunities and rapid sun tanning.

### 2.2.2 Rainfall

The average annual rainfall is around 500 mm., falling mostly between October and April, although summer rain is not unknown<sup>1</sup>. Rain falls mostly during autumn/winter thunderstorms that are known to yield more than 50 mm/h and cause considerable damage to agriculture and the urban infrastructure. Hail is another form of precipitation that occurs mostly in winter months but the phenomenon is relatively rare (although again it causes damage to agricultural products). Lightning, which often accompanies the heavy rain, can disrupt communications and power supplies and in very rare instances is known to have caused casualties and damage. It occurs mostly in the period between September and December but can take place during any month of the year.

### 2.2.3 Humidity

Humidity is generally high in view of the proximity to the sea. Apart from the great discomfort that this causes in hot summer days, it contributes to a perception of colder weather in winter. The local construction methods and the absence of central heating in most residences accentuates this problem in the colder months leading to considerable expenditure in heating. The high humidity and sea spray also contribute to accelerated corrosion in metals.

### 2.2.4 Wind

The annual average wind speed is around 10 Knots or 17 km/h. which is considered as moderately windy. Gale force winds or higher are relatively rare occurring only on a few days each year. When this occurs, transport between the Islands is disrupted causing considerable discomfort.

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<sup>1</sup> Note: Also refer to data given in [APPENDIX A](#)

### 2.2.5 Sea Temperatures

Sea temperatures are relatively mild ranging on the Celsius scale from the low teens to the high twenties. This, coupled by the relatively calm sea throughout summer and the crystal clear waters attract thousands of swimmers to the more accessible coastal areas and divers to the deeper waters.

## 2.3 Natural Environment – General

### 2.3.1 Introduction

General aspects of the Gozitan physiography were already indicated in **Section 2.1**. The stratigraphy of Gozo is based on sediments deposited in the Oligo-Miocene era, and the rocks are about the same age as their mainland Malta counterparts. Tectonic and weathering agents acted to mould the current geomorphology. The result was slightly different from the mainland Malta situation as the whole island is dominated by hills and there is a higher predominance of clay in Gozo. The greater water retention capabilities of the soils and underlying rock have overall rendered Gozo more fertile. However, human presence over a few millennia has also implied that much of the former natural forest cover has been lost and in Gozo and Comino, trees are limited to tiny pockets which are almost invariably the result of human intervention.

### 2.3.2 Geology

Upper Coralline Limestone dominates the higher areas of Gozo as well as the whole of Comino. Greensand is found underneath Upper Coralline layer with a maximum thickness of 18m. occurring in Gozo. Blue clay outcrops predominate in Gozo as taluses and have generally been cultivated. Globigerina limestone, some strata of which are used in the building industry, occur throughout Gozo and again are mostly overlain by cultivated land. Lower Coralline Limestone is mainly confined to limited stretches of coastal areas and along some pluvial valleys.

Exposed rock formations in Gozo are rather limited and occur mainly in coastal areas, along the cliff edges, at *Ta' Cenc* and on the as yet undeveloped plateaux. Most of the rest of Gozo is covered in geologically immature soil complexes that have seen much movement through human interaction. Soil depth varies from a few centimetres to over half a meter in the flat alluvial plains. In view of the greater presence of clay, the water retention capabilities of the soil are higher and agricultural productivity is correspondingly higher. This factor is helped by the presence of a number of springs, which aid in the irrigation of fields and contributes to the water supply requirements of Gozo.

The geology of Gozo also determines the geomorphology of Gozo and Comino. The tectonic and erosion forces have over long periods of time created pleasant landscapes which when coupled with traditional human activities give Gozo the scenic character which is so much sought after. The beauty of landforms is not limited to land but extends to submarine environments. Divers flock to Gozo to experience these underwater geo-morphological features.

### 2.3.3 Ecology

The ecology of Gozo is very much dependent on the location and extent of the various Major and Minor Communities which occur on the Island. These have been grouped according to the following classification:

#### Major Communities

- Woodland Communities
- Maquis Communities
- Steppic Grassland Communities
- Disturbed Ground Communities

#### Minor Communities

- Coastal Communities
- Rupestral Communities
- Freshwater Communities
- Cave Communities

Most of the woodland communities survive only in the tiny pockets of afforestation areas and other such areas planted by man. Maquis communities are again normally restricted either to the steep Upper Coralline / Greensand to clay interface, in boulder areas and on some tracts of abandoned agricultural land. Steppic and disturbed ground communities are more common in view of the wide agricultural practices and the considerable earth-shifting operations that man continuously undertakes. Many of the minor communities are threatened by virtue of the often very limited extent of the habitat and the presence of incompatible human activities.

A number of endemic species exist in Gozo. Some, like the *Darniella Melitensis* are fairly widespread along uncultivated coastal areas, others are restricted to areas of only a few square meters. In the latter instances, it is conceivable that a single incident easily wipes out a species from the face of the earth. Hence the importance of safeguarding such fragile ecosystems.

## 2.4 Man-made Environment – General

### 2.4.1 General

Like mainland Malta, Gozo has been extensively moulded through human intervention. Buildings, structures, roads, surfaced open spaces and excavations dominate urban areas and sites within rural areas (in latter case eg. Quarries, cemeteries, the Heliport at *Xewkija*, Racecourse track at *Xewkija* etc.). In rural areas, terraced cultivated land or abandoned fields dominate. The only practically untouched areas are the cliff faces and areas which are still dominated by garrigue, however even the latter are often laced with archaeological remains, hunting and trapping hides as well as flora and fauna introduced through human intervention. Erosion associated with vehicular intrusion or human trampling, litter and debris introduced by man and informal tracks can also be found in these least intervened upon areas. On Comino, there are several services which cater for Gozo and Comino and these also pass through

garrigue. In conclusion, it can be assumed that there is no spot on Gozo and Comino which has not been touched by direct or indirect human intervention.

#### 2.4.2 The Gozitan Skyline

The skyline of the urban settlements is almost invariably centred on a church. These ecclesiastical buildings dominate the skyline of Gozo by virtue of their mass, design and location. The *Xewkija* Parish Church for example is easily visible from many parts of western mainland Malta. Other structures such as windmills, watchtowers, the *tal-Gurdan* lighthouse, and telecommunication towers such as those at *Xewkija* and at *Ta' Sarraflu* are amongst other prominent man-made features of the Gozitan skyline. More recently, a large factory at *Xewkija*, the Sports complex at *Rabat*, the commercial Complex also at *Rabat* as well as the extensive development at *Marsalforn* and *Xlendi*, have contributed to an alteration of the traditional Gozitan skyline through their mass, design of the facades, the alien materials, colour and texture and the general adoption of a large aperture to solid ratio in the elevational treatment. Development of tasteless orthogonal apartment architecture at the edge of some of the ridges has seriously impaired on the traditional urban skyline in Gozo (refer to Chapter 4)

#### 2.4.3 Planimetry

The planimetry of the older settlements tends to be different from the older settlements in Malta. Although the same principle of narrow winding roads applies, the pattern tends to spread out as ribbon development along the main vehicular thoroughfares. Newer areas such as *Marsalforn*, *Xlendi*, areas of *Rabat* and the more recent additions to the larger Gozitan settlements, have adopted a more regular or rectilinear development layout. *Marsalforn* and *Xlendi* are also unique in the sense that their skyline is not dominated by a church but by incongruent residential, commercial or tourism related modern buildings. With the exception of the *Rabat / Fontana / Kercem* area, the settlements in Gozo have remained physically separate from each other. (see Chapter 4 for more detail)

#### 2.4.4 Industry

Industrial development is confined mainly around the *Xewkija / Rabat* area although a small crafts village can be found at *Ta' Dbiegi* in the vicinity of *Gharb*. Various small-scale industrial concerns can be found interspersed amongst the residential built fabric. Apart from the visual impact of the large food processing plant at *Xewkija*, other industrial development in Gozo is not very evident nor proportionately land intensive.

#### 2.4.5 Agriculture

Agriculture is the main land-user in Gozo accounting for around 60 % of the whole territory. It is the single-most important land-use which moulds or has moulded the landscape of Gozo and which makes significant contributions to its picturesque qualities. Agriculture also makes substantial direct and indirect contributions to the economy of the island. Unfortunately, most of the land on the steeper slopes is being abandoned and subsequently eroded since the soil retaining rubble walls are no longer maintained and thus fall into a state of disrepair.

The area between *Xewkija* and *Rabat* is dominated by greenhouses and apart from the considerable visual impact and land-take, the area represents the largest concentration of greenhouses in the Maltese Islands. Other greenhouses are found interspersed around Gozo.

Animal farms tend to occur in the area between *Xewkija* and *Sannat* but other farm-buildings can be found all over Gozo.

Agricultural stores tend to be smaller than their Maltese counterparts and till the late 1990's, the Gozo countryside has been relatively free from the over-clutter of agricultural stores which is found in some areas of rural mainland Malta.

#### 2.4.6 Rural Settlements

Isolated and clustered farm-houses tend to occur in many rural parts of Gozo with a particular concentration in the *Gharb* area. In general, these residential dwellings tend to blend well within the landscape. Some of the Gozitan hamlets are genuine in the sense that they have grown organically over a long period of time. These hamlets have a very harmonious and peaceful setting which tends to make them attractive to people who want to get away from the busier areas.

Since the late 1980's, pressures have mounted to construct more of these types of dwellings and to emulate the features of the original hamlets and vernacular architecture. Existing farmhouses are being upgraded though the addition of rooms, external gardens and swimming pools, thus creating very desirable properties which normally enjoy breathtaking vistas. New farmhouses resembling the older ones and having modern facilities were also constructed. The problem with this trend is that no matter how tastefully these farmhouses are constructed, additional intrusions would tend to over-develop the countryside and thus disrupt the very peaceful setting that makes them attractive in the first place.

#### 2.4.7 Quarries

Extractive Industry in Gozo is mainly limited to hard-stone and soft stone being quarried through open pits. Most of the operational soft-stone quarries occur in western Gozo around the *Qawra / Dwejra* area which incidentally is also an area of high landscape value of considerable scientific interest. These two conflicting land-uses have eluded resolution for a considerable period of time.

Hardstone extraction has recently tended to be mostly confined to the coastal quarries in the *Qala* area. Whilst the surrounding topography significantly reduces the visual impact of these quarries, operations cause widespread local dereliction and wider scale disruption through the generation of copious quantities of dust.

## 2.5 Summary

Gozo and Comino, like mainland Malta, are islands which are strongly moulded through human intervention which dates back around seven millennia. The presence of water and the equitable climate have continued to attract visitors over the ages. Gozo's agricultural potential

has been well exploited and the land gives a significant contribution to the community's vidual requirements. The urban and rural activities have moulded the topography to such an extent that it is almost impossible not to perceive evidence of human influence or presence. Yet, in spite of all this intervention, some parts of Gozo and Comino still convey the get away from it all feeling, characteristics which when coupled with the highly sought after Mediterranean climate, the intense cultural experience and the landscape/seascape of Gozo, make it a most desirable place to visit or to live in.

Gozo and Comino are not only composed of the physical aspect but the human aspect is fundamental to the maintenance and enhancement of the Islands' positive characteristics. Furthermore, even though Gozo is a predominantly rural area and conveys an impression of peacefulness and tranquillity, it is well serviced in terms of infrastructural services, residential unit stock and other commodities. Gozo is by no means a desert island and the human element is very much part of the island and for planning purposes, the latter aspect has to be considered in conjunction with the former. The main socio-economic parameters will therefore be addressed in chapter 3. Comino is much more isolated and it is more comparable to a desert island (especially in winter), even though human activity is still present. In summer, its sheltered bays and *Cominotto* channel (*Bejn il-Kmiemen*) is becoming ever more overcrowded by hundreds of visitors who reach the area through all sort of marine pleasure craft.

## 3. SOCIO-ECONOMIC CONSIDERATIONS

### 3.1 Introduction

Development requirements are invariably generated by the resident or transient populations of an area. In planning for land-use, it is essential to analyse the current population, its structure and distribution, together with projections for the future. The current and future demands on land resources are thus better understood. Other factors such as the nature of the economy and the type of development that this entails, the type of employment generated and other land-uses which are envisaged in order to satisfy the requirements of the local and transient population, also need to be analysed. An understanding of the culture in Gozo is equally important. Current and future physical development has a significant influence and is in turn influenced by the cultural patterns occurring on the relevant area.

In this exercise, apart from analyses of raw data, it is important to interpret statistics and to undertake discussions with various sectors of society in order to understand the forces underpinning development and change in land-use. In the Gozo situation, the land resources of the 65.8 km.<sup>2</sup> of territory as well as activities in the surrounding water together with land on Comino, have to be shared by around 30,000 inhabitants and around 700,000 visitors per annum. Often there is competition by different users for the same tract of land or water body. In other instances, a development on one tract of land causes inconvenience or creates hazard to adjacent land-users.

In this section, human activities on Gozo and Comino are highlighted whilst in the following sections the emphasis will be on the type of development which accommodates or is envisaged to accommodate human needs.

### 3.2 Demography

#### 3.2.1 General

The enumerated population of Gozo and Comino in late 1995 stood at 29,026<sup>2</sup> persons. Of these, only three are known to have permanent residence in Comino. On the same date, the Maltese Population in Gozo stood at 28,920<sup>3</sup>. In June of the year 2,000, the Maltese population of Gozo and Comino is estimated to be around 29,500<sup>4</sup>. Expatriate residents make up only a small proportion of the Gozitan population. In fact in 1995, only 759 persons were enumerated as non-Maltese citizens and this represent only 2.6% of the total enumerated population.

Around 22% of the population of Gozo lives in the capital *Rabat (Victoria)*. Given that *Fontana* and *Kercem* form practically one settlement with *Rabat*, it could be stated that more

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<sup>2</sup> Census for the Maltese Islands - 1995

<sup>3</sup> *ibid.*

<sup>4</sup> Strategic Planning Unit, PA -estimate for mid-year 2000 indicated as 29,343.

than 30% of the Gozo population live in this area. Another 37% live in the settlements of *Nadur*, *Xaghra* and *Xewkija*. Most of the remainder 33 % live in the other towns and villages in Gozo. This implies that most of the population of Gozo is concentrated either in settlements around the Gozitan Capital or in the settlements around the vehicular link between *Rabat* and the *Mgarr* harbour.

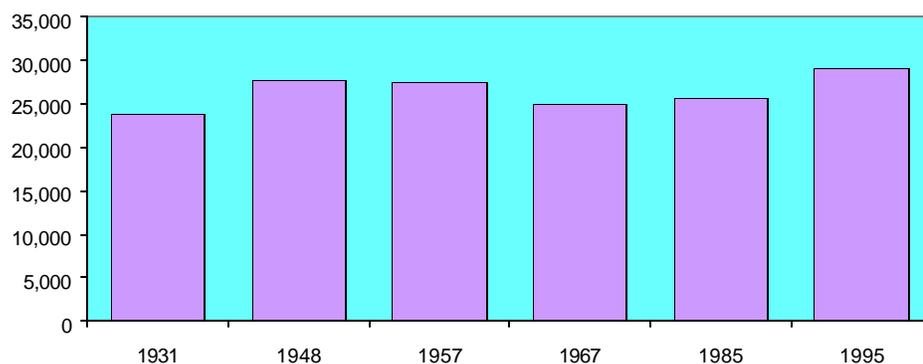
### 3.2.2 Population Changes

The population of Gozo can be considered as a stable population (see **TABLE 3.1**). Reference to past Censuses indicates that the population of Gozo has remained fairly stable since 1931. The population of Gozo in 1931 was 23,837 whilst that in 1995 was 29,026, an increase of 21.7% over a period of 64 years. Indeed, some localities have experienced a decline in population since 1931, especially in *Gharb*, *Ghasri* and *Qala*. The highest increase in population (32% from 1931 to 1995) was registered in the *Rabat/ Fontana* area (although *Fontana* itself has registered a decline since 1967 when it was first enumerated as a separate locality). This indicates a tendency towards urban mobility in the Gozo population<sup>5</sup>.

Median projections undertaken for the Strategic Planning Unit (Planning Directorate) indicate that within the time-frame of the local plan, the Maltese population of Gozo will increase to 30,529 persons. Thus in the span of 15 years from 1995 to 2010, the population of Gozo will only increase by 1,609 persons or 5.6% of the current Maltese population.

**TABLE 3.1**

**POPULATION GOZO 1931-1995**



Source: Malta Censuses of Population 1931-1995

### 3.2.3 Population Density

In 1995, the population density of Gozo (excluding Comino) stood at 423 persons per km<sup>2</sup>. This corresponds roughly to 35% the population density of the Maltese Islands and only 8% the

<sup>5</sup> Indicated in topic paper on demography, SPU

population density of the Inner Harbour Region. When considered together with Comino as a region, in 1995 the Gozo Region was the least densely populated region in the Maltese Islands. Surprisingly, the population density of two local councils, namely that of *Victoria* and *Fontana* significantly exceeds the national population density. In fact, *Victoria* has a population density of 2250 persons per km<sup>2</sup> whilst *Fontana* has a population density of 1725 persons per km<sup>2</sup>. The population density for the Maltese Islands stood in 1995 at around 1200 persons per km<sup>2</sup>. The population density of mainland Malta stood at 1409 persons per km<sup>2</sup>. The council with the lowest population density is *Ghasri* with 74 persons per km<sup>2</sup>.<sup>6</sup>

In spite of being a Rural Conservation Area, the population density of Gozo corresponds with that of fairly densely populated countries. For example, the United Kingdom has a population density which is one half that of Gozo. **TABLE 3.2** illustrates.

**TABLE 3.2**

**1995 POPULATION DENSITIES OF SELECTED COUNTRIES COMPARED TO THE POPULATION DENSITY OF MALTA AND GOZO**

Country / Island	Population Density (persons/km <sup>2</sup> )	Comparative Rank
<b>Malta</b>	<b>1,409</b>	<b>1</b>
Bangladesh	810	2
Taiwan	578	3
South Korea	448	4
<b>Gozo</b>	<b>423</b>	<b>5</b>
Netherlands	403	6
Japan	331	7
Belgium	328	8
United Kingdom	238	9

Source The Economist Pocket World in Figures 1996 p.10 and Malta Census of Population 1995 .

### 3.2.4 Population Structure

The population distribution of Gozo indicates that it is an ageing population. In 1995, 19.4% of the Gozitan population was 60 and over years old. In the year 2010, this percentage is envisaged to increase to 22.1% or almost one fourth of the total population. Conversely, children under 10 years of age accounted for around 15% of the population in Gozo and by 2010 the same percentage is expected to decrease to 11.9%<sup>7</sup>.

During the intercensal period 1985-1995, the average annual change of population in Gozo was 1.22% increase per annum, compared to 0.88% for the Island of Malta. However,

<sup>6</sup> Census for Maltese Islands - 1995

<sup>7</sup> Based on Demographic projections by the Strategic Planning Unit.

Malta's figure was weighted down by the negative growth in the Inner Harbour Area as all the other regions were showing growth rates greater than that of Gozo. Apart from the Inner Harbour Area, the least growth rate in Malta occurred in the Outer Harbour Region (1.35% p.a.) whilst the highest growth rate was registered in the Northern Region (3.31%)<sup>8</sup> The population density also increased from 368 persons per km<sup>2</sup> to 422 persons per km<sup>2</sup>. Density wise, the Gozo region also experienced the smallest positive increase of any region in the Maltese Islands, another indicator that the population of Gozo remained fairly stable.

### 3.2.5 Household Size

Statistics on the average actual and projected household size are important demographic indicators in planning as they identify residential development requirements. The average household size in Gozo has experienced a decline over the years. The average household size in Gozo in 1995 was 3.12 whilst that in 1985 was 3.15. Projections by the Planning Directorate's Strategic Planning Unit (SPU) indicate that by 2010, the average household size will decrease to 2.62 persons per household. This implies that less people are living under one roof and therefore that more dwellings will be required for a given population. In projected housing needs terms this implies that for residential purposes, 1,419 new residential units will need to be created during the local plan period (see TABLE 3.3)

**TABLE 3.3**

**POPULATION AND HOUSEHOLDS IN GOZO – 1985-2010**

YEAR	1985	1995	2000	2005	2010
Population	25,682	28,920	29,343	29,863	30,529
Households	8,153	9,188	10,232	10,942	11,651
Average Household size	3.15	3.12	2.86	2.72	2.62

Source: Malta Census of Population and Housing 1995 and SPU demographic projections

### 3.2.6 Migration

Data compiled by the SPU indicates that internal migration within Gozo tends to be very limited. Inter-Island migration is also rather limited. Changes in the Oct 1998 Electoral register data indicate that there have not been significant increases in population. The same applies to settlement by expatriates and returned migrants. Statistics indicate that there was an influx in the late 1980's and early 1990's<sup>9</sup> but this has slowed down considerably in recent years and makes a negligible contribution to increase in population. The indications are that the rate of return migrants has stabilised and most probably will continue to decrease.

<sup>8</sup> Census of Population and Housing Malta - p.xl Table 2.

<sup>9</sup> The 1995 census indicates that in 1989, there were 279 returned migrants but these decreased to 79 in 1997 according to the demographic Review 1997.

There are two basic categories of non-Maltese populations. The first is associated with transient tourism whereby the length of stay is normally less than 15 days and the temporary accommodation is provided through tourism related facilities such as hotels, guest-houses, residential farm-houses and so forth. The second term relates to longer-term accommodation whereby the residents opt to stay for long periods or even to settle permanently. Estimates for 1996 indicate that c. 630,000<sup>10</sup> visited Gozo. This figure does not imply that all of these tourists spend at least one bed night in Gozo as many may have spent just a day in Gozo and returned to Malta later in the day. In fact in 1996, hotels in Gozo have hosted 54,057 visitors of who 35,216 were foreign and 18,841 were Maltese. This implies that only 8.5% of visitors opted to stay in one of the hotels. Apart from those who opted to cross back to Malta on the same day, the rest have either found accommodation in flats or farmhouses or else stayed with relatives or friends.

## 3.3 Economy

### 3.3.1 Introduction

In the past, the Gozitan economy was associated with unemployment and emigration. From the mid-fifties to the mid-eighties, around 14,000 Gozitans emigrated. According to Briguglio (1995)<sup>11</sup>, until recently, agriculture and fishing were the most important economic activities. However, the economy is now undergoing a process of modernisation with tourism and manufacturing increasing their contribution to the economy. It is estimated that emigrants make a considerable contribution to the Gozitan Economy.<sup>12</sup>

Being a small economy, minor changes in Government policy, financial climate and other internal and external factors can have a substantial effect on demand for services in Gozo. Reliance on part-time work allows the Gozo economy to adapt to changing demand. Greater flexibility provides for sustained levels of economic activity.

The performance of an economy can be measured in many ways. Employment by type and income bracket are just two of the indicators. In the local context, statistics that analyse income are associated with uncertainties that would give a very different picture if actually taken into account. Employment figures may be more reliable and easier to extract but again there are many uncertainties related to the method of data collection and analysis as well as the possibility of data errors. The balance of accounts of an area can be considered as another indicator of economic performance. However, accounts for Gozo are normally aggregated with those for Malta and therefore it is difficult to extract data which is relevant to Gozo only.

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<sup>10</sup> Tourism, a pillar of Sustainable Development in Gozo p.21

<sup>11</sup> Gozo and its Culture -edited by L. Briguglio and J. Bezzina, Formatek, Malta 1995 p.129

<sup>12</sup> Statement based on communication by Dr. Ray Scerri, Policy Co-ordinator, Ministry for Gozo.

### 3.3.2 Employment

In Gozo, more people are employed in the private sector rather than with the public sector. In the years 1994-1999, there seems to have been a downward trend in employment. This could be the result of various factors.

Most of the Gozitan public sector employees work in five departments; namely education, public works, hospitals, agriculture/fishing and public cleansing. Private sector employees are mainly employed in the industrial and services sector. Whilst agriculture is the largest land-user in Gozo, it only accounts for around 6% of employment. However, the agriculture and fishery sector is also relatively large when compared to the Maltese counterpart with the percentage of the working population for Gozo being 3 times higher than that for the Maltese Islands.

## TABLE 3.4

### GAINFUL EMPLOYMENT IN GOZO AND MALTA (DEC. 1994)

SECTOR	GOZO		MALTESE ISLANDS	
	No.	%	No.	%
Public Sector	4,610	45.7	55,209	41.2
Private Sector:	5,470	54.3	78,691	58.8
Agriculture/fishing	602	6.0	3129	2.4
Industrial	2,407	23.9	34,829	26.0
Services	2,461	24.4	40,733	30.4
<b>Total Employment</b>	<b>10,080</b>	<b>100.0</b>	<b>133,900</b>	<b>100.0</b>

Source: Briguglio L in "Gozo and its Culture", Formatek Ltd. 1995 p. 130

## TABLE 3.5

### EMPLOYMENT IN GOZO BY SECTOR 1995-1999

SECTOR	DEC 1995	DEC 1996	DEC 1997	DEC 1998	SEP 1999
Public Sector	3966	4000	3974	3784	3759
Private Sector	5843	5760	5752	5718	5831
Private Sector (excl. SE)	3172	3111	3075	3079	3186
Self-Employed	2671	2649	2677	2639	2645
<b>Total Public and Private</b>	<b>9,809</b>	<b>9,760</b>	<b>9,726</b>	<b>9,502</b>	<b>9,590</b>

Source: Extracted from article by Mary Darmanin in "Maltese Islands on the Move", COS 2000.

**TABLE 3.6****EMPLOYMENT (BY SECTOR), GOZITANS WORKING IN MALTA AND UNEMPLOYMENT FOR THE ISLAND OF GOZO (END-1999)**

SECTOR	MALE	FEMALE	TOTAL	% TOTAL
Private Sector	3908	1861	5769	54
Government and Parastatal	3052	697	3749	35
Gozo Residents working in Malta	380	230	610	6
Registered Unemployed	493	103	596	5
<b>Total</b>	<b>7,833</b>	<b>2,891</b>	<b>10,724</b>	<b>100</b>

Source: Seminar “The Effects of EU Membership on the Island Region of Gozo” – Imgarr Hotel 28/01/2000

Unemployment at the end of 1999 stood at around 600 persons, this figure representing around 5% of the working population. It is also important to note from **TABLE 3.6** that around the same number of persons ie. 610 people depended on Malta for employment. In early 2001, the number of Gozitans working in Malta with Government Departments was 344 persons<sup>13</sup>.

The Household Budgetary Survey 2000<sup>14</sup> has indicated Gozo with the lowest unemployment rate (2%) and the highest inactivity rate in the Maltese Islands. Inactivity rate however may include housewives and senior citizens and therefore not as good an indicator as unemployment. Whilst the sample size was restricted to around 7000 respondents, it is still fairly representative and hence unemployment for the year 2000 appears to have decreased from the 1999 figures indicated in **TABLE 3.6**. Equally significant is the fact that in early 2001, the number of unemployed in Gozo reached an all-time low of 382 persons, the figures thus indicating a reversal in trends<sup>15</sup>.

It is important to create an adequate employment infrastructure for Gozo to promote an economically sustainable situation because:

- It helps to generate revenue to support the economy in Gozo.
- It minimises on the requirement to commute to mainland Malta in search of job opportunities. Thus current levels of population are maintained thereby safeguarding the current social life of Gozo.
- It reduces the Island’s dependency on Malta for job provision and thus reduces demands on the Island of Malta’s own job market.

<sup>13</sup> Source: The Times of Malta, Thursday 18 January 2001..“Gozitans working in Malta”

<sup>14</sup> Source: Household Budgetary Survey 2000, News Release No. 82/2000, 3/11/2000

<sup>15</sup> Source: The Malta Independent, Tuesday 13<sup>th</sup>. February 2001 page 9.

- It allows for the reduction of Gozitan public sector employees and hence reduces Government's recurrent expenditure

Gozo has no natural resources. Hence, job creation is dependent on its ability to generate demand for its services. Bringing people to the island is a means for generating demand for services and hence creating employment. This will benefit:

- the accommodation and catering sector
- the industrial sector including small industries for the production of furniture, aluminium etc. for accommodation and catering establishments
- agricultural sector because of increased demand for food
- transport sector including buses, taxis, coaches, self-drive cars, inter island ferry and helicopter
- commercial sector mainly retail but also to a lesser extent offices.

## 3.4 Cultural Issues

### 3.4.1 General

The 4 km. body of water which separates Gozo from Malta, coupled with the Island's size and different geomorphology, have given rise to a number of cultural differences, some of which have a significant impact on land-use issues. These differences have only recently started to be studied in some depth and to date, much information remains to be compiled and disseminated. Most of the extant information is based on widely known impressions, which although possibly valid, still have to undergo the scrutiny of academic research to verify or otherwise existing perceptions. Furthermore, whilst evidence of cultural differences may be openly manifest through differences in development patterns, it is more difficult to understand those forces which explain the patterns.

### 3.4.2 Context

The Gozitan population has since time immemorial had to face difficulties arising from the limited resources found on the island. This factor has probably induced the average Gozitan to maximise on the available resources and perhaps to foster a greater spirit of entrepreneurship. Not only have Gozitans managed to provide for themselves a good standard of living but indeed a number of Gozitans have occupied key positions within the Maltese society. Others have made a name for themselves abroad. Whilst the greater drive of the average Gozitan is acknowledged by many Maltese, studies encountered by the Gozo and Comino Local Plan (GCLP) which explain this phenomenon are still very limited.

This spirit of independence is not only reflected in the different political ambience in Gozo but also in a perceived reluctance to share information with "outsiders". Meetings with various Gozitans also hint at a resentment that "mainland Maltese" are interfering and sometimes

dictating on what is considered as Gozitan internal affairs<sup>16</sup>. Whilst this state of affairs may not be considered relevant from a land-use point of view, closer inspection reveals that it is indeed most relevant. Greater difficulty in accessing, compiling and examining reliable information renders the planning exercise much more difficult. Furthermore, if a plan is perceived as imposed by an external agent, implementing it can be extremely difficult. Finally, some of the projects that have materialised in Gozo are perceived to have their roots not originating from specified planning requirements but from a need to “keep up with the Jones’ “ (ie. mainland Malta) or to fulfil a local cultural requirement.

Historically *Rabat* was the focal point of Gozo life and hence most services are provided in *Rabat*. Many Gozitans go to *Rabat* frequently some on a daily basis for work or schools; others possibly two or three times a week for shopping, a cultural or religious activity or for some other purpose. Most of these activities are within a relatively small area. The diversity and range of uses generate relatively high numbers of people which in turn make *Rabat* centre full of vitality. From a planning point of view, *Rabat* is thus rendered the hub of activity with the consequent planning repercussions related to the provision of adequate infrastructure. The centralisation of commercial activities tends to render them more convenient for the users.

### 3.5 Land Ownership

There are four basic types of land ownership in Gozo; Public land, Land administered by the Joint Office, Church land and Private land. The location, extent and title of public land is recorded and kept at the land registry in Gozo. Public land is utilised for a wide variety of projects ranging from social housing to facilities used by Local Councils. Significant proportions of public land are leased to part-time or full time farmers in order to cultivate crops. Other stretches of leased public land are used by individuals or associations to undertake recreational activities.

Joint Office land is administered according to the provisions of ACT IV of 1992. The main thrust of the legislation is to utilise specific ex-church land for social and community facilities. The Joint office has embarked on the considerable task of gathering primary data on Joint Office land and by 1999, although significant progress had been registered, the exercise was far from complete. Church land on the other hand is utilised mainly for pastoral facilities, facilities for the religious community and for other purposes as deemed by the religious community.

Private land is fairly extensive in Gozo and is distributed throughout the whole territory. Ownership parcels are in general perceived to be smaller than in Malta and it is generally more difficult to determine private ownership titles in Gozo than in Malta as the relevant information database is still being developed.

Government and Local Councils show great preference in developing their projects on public land with Joint Office land being the next option in line. Expropriation policies, although

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<sup>16</sup> Reference to this impression is reinforced through the Introduction by Dr. Mario Tabone in “Transport - A pillar of Sustainable Development in Gozo”, BOV 1993

still legal, and not favoured in view of considerable additional cost borne by the relevant public agency if it resorts to expropriate and compensate the original owner. Furthermore, there are other socio-economic repercussions which current public policy tries to avoid.

There are a number of planning implications originating from the policy of utilising public land and joint office land for public projects. The most important ones are:

- a) The site may not be well serviced with the basic infrastructural requirements of the particular project.
- b) The topography may not be appropriate for the particular intervention, thereby adding to the costs.
- c) The relationship of the location of the project may not be ideal with respect to the needs of the community.
- d) The setting of the development may be out of context with the surrounding natural and man-made features.
- e) The extent and juxtaposition of land ownership may hinder optimum design configuration. Communication with other transport and infrastructural networks may be similarly hindered.
- f) There may be items of natural or cultural value which may be irretrievably damaged or lost if the particular project materialises.
- g) Public authorities may shy away from projects which unavoidably have to include considerable tracts of public land.

Given the above-mentioned socio-economic realities, the intervention of planning to steer development towards more appropriate locations becomes very difficult.

## **3.6 Planning and Gozo**

### **3.6.1 Introduction**

Since the inception of the Planning Authority in 1992, development control and enforcement was monitored through statistics which recorded the outcome of decisions or actions of the application of the new system of planning. Statistics relating to the number of applications and their nature give indications of trends in development on Gozo. Similarly, statistics relating to enforcement give an indication of compliance. However, figures must be treated with caution and coupled with other statistics as speculation rather than tangible need can be the driving force behind higher rates of development.

### **3.6.2 Planning Permission**

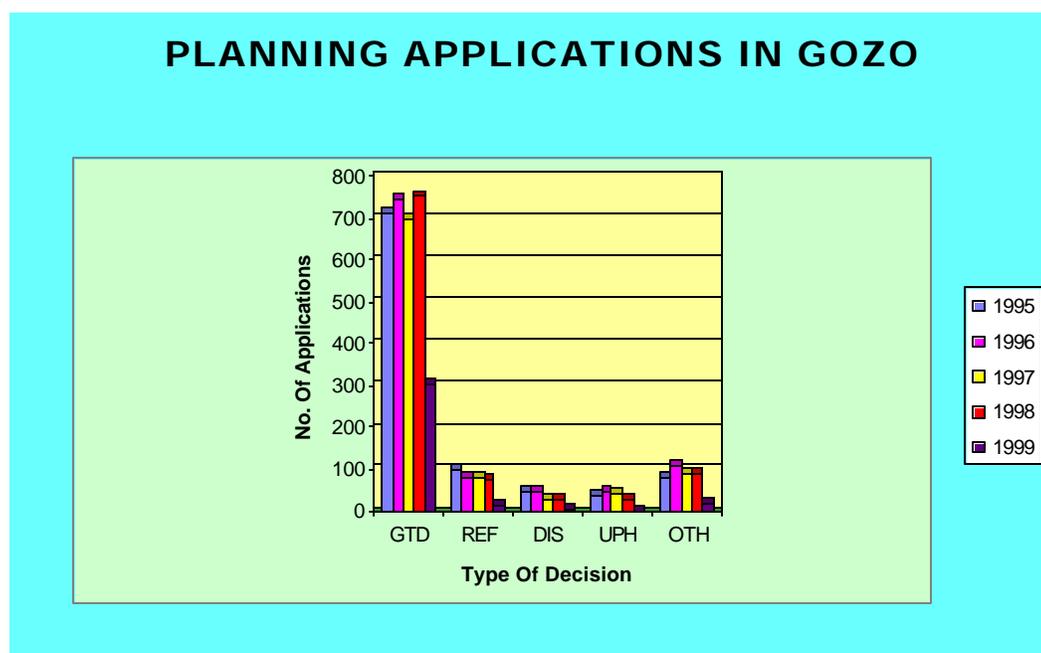
The planning permission aspect of planning is one of the most visible indicators of the performance of a planning system. A new system of development control was introduced in the early 1990's and since then, there have been mixed feelings about the performance of the new system. Whilst it is widely acknowledged that the new system is more transparent and technically rigorous than the previous system, there have been many complaints about "unnecessary delays"

**TABLE 3.7** refers to decisions on applications which were submitted during the years 1995 to 1999. This table clearly shows that contrary to popular belief, the overwhelming majority of applications submitted with the Planning Authority are approved. The percentage of approved applications is also rising. From the planning applications submitted in 1995, 87.5 % were subsequently approved. The figure rose to 93.4% of the applications submitted in 1999.<sup>17</sup> The other main issue of concern relates to delays in processing of planning applications. There are indications that the average length of processing time has been decreasing. Furthermore, it must also be borne in mind that certain complicated applications have to undergo detailed scrutiny by the directorate and in certain cases are subject to environmental impact analyses. Additionally, some of the applications are refused in the first instance and in many cases are referred to the appeal process. In such cases, the eventual outcome can easily take several months after the initial decisions. It is also important to point out that the public expectation for processing of applications Outside Development Zones (ODZ) is similar to that for applications within schemes. There is great difficulty in communicating to the public that development in areas ODZ is the exception rather than the rule but still there is the expectation to get approval. Another complication arises out of reluctance to accept established policies, basing claims on precedents that were established when the planning process operated under a different policy regime. Inconsistencies in boards' decision contributed to yet another complicating factor, as did several policy interpretation lacunae.

Between 1995 and 1999, almost 4,300 planning decisions for proposals on Gozo and Comino were taken. This amounts to around 1,100 decisions per year. This is a staggering amount for such a small island. The range of applications was also very extensive ranging from development of major hotels to minor alterations. The number of ODZ developments and the percentage of the total are also significant. **TABLE 3.8** indicates that the percentage of ODZ applications in Gozo amounts to approximately one fifth of the total number of annual applications. This is quite a high number given that areas ODZ are supposed to be mainly off-limits to development. Village cores on the other hand accounted for around one third of the total number of annual applications. These two factors may partially explain the complaints about delays in the processing of applications since both types of application require more resources and time to process.

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<sup>17</sup> Note : The decrease in decided application in 1999 relates to files being still processed. The graph relates to statistics compiled in June 2000.

**TABLE 3.7****PLANNING PERMIT APPLICATION DECISIONS BY FILE NUMBER  
YEARS 1995-1999**

Source: Planning Authority –

Notes GTD = Granted, REF = Refused, DIS = Appeal dismissed, UPH = Appeal Upheld, OTH = Other

**TABLE 3.8****PLANNING PERMIT APPLICATIONS IN AREAS ODZ AND VILLAGE CORES  
( 1995-2000)**

Type of Application	1995	1996	1997	1998	1999	2000*
ODZ applications	178	196	144	204	160	108
% ODZ to total applications	18%	19%	15%	20%	20%	20%
Village Core Applications	308	307	296	336	271	184
% Village Core Applications to Total Applications	32%	30%	31%	32%	34%	35%

Source: Planning Authority - \* Note: figure for year 2000 updated till 1/08/2000.

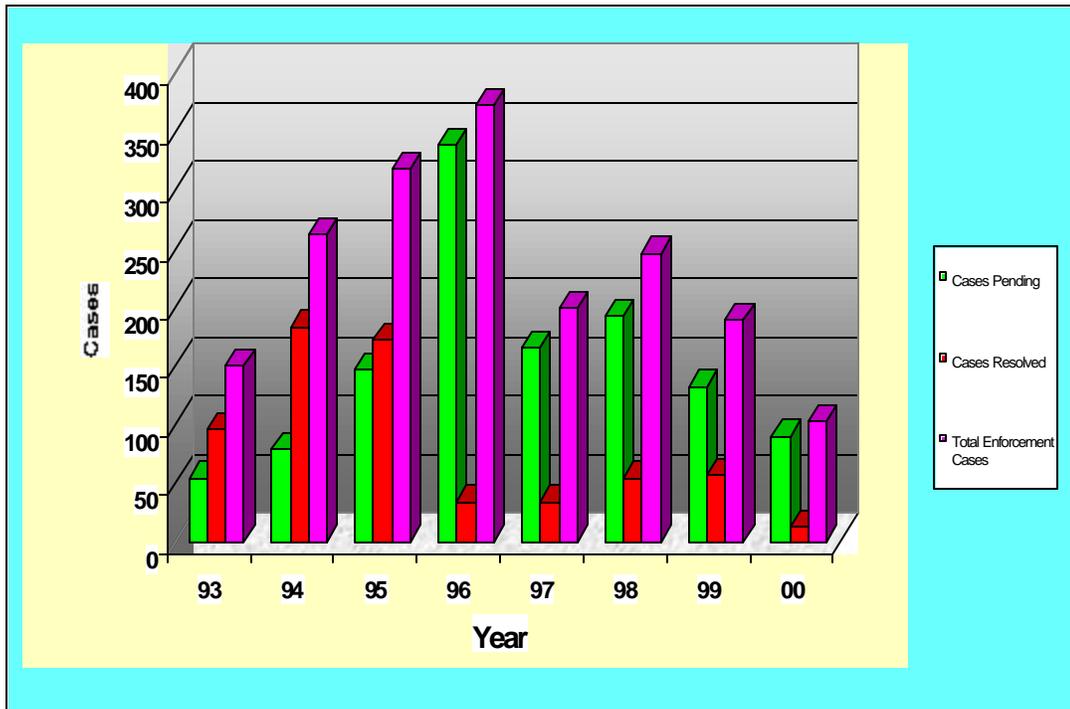
Development Control related problems tend to be more pronounced in areas where there is more pressure for development. For example, in areas like *Rabat*, *Marsalforn* and *Xlendi*, there are instances where the height of the constructed buildings does not correspond with the stipulated height limitation. Apart from illegal buildings and decisions related to outdated policies, this phenomenon has mainly arisen from precedents created by isolated planning permit decisions. Therefore, planning case-officers are faced with having to make recommendations that obviously do not reconcile with the situation in the germane built environment.

### 3.6.3 Enforcement

Enforcement of planning decisions and of development regulations, constitute a very important component of the planning process. The outcome of any plans or policies eventually translates into changes in the landscape and it is these changes which are evident for all to see, experience and judge. If implementation is weak, no matter how much effort goes into the rest of the plan making process, the results do not show. On the other hand, rigorous enforcement of policies which are not in tune with pragmatic social requirements may result in unnecessary conflict and may stifle development.

Various meetings with agencies in Gozo have indicated that enforcement is very rigorous in Gozo and is interfering with the normal course of development of the islands. If the development control statistics are examined, it transpires that there were 4,300 development permit decisions between 1995 and 2000. During the same period, around 1,400 enforcement actions were taken. These translate into the equivalent of circa one third of the decisions being served with an enforcement notice. The figures indicate that there is a strong tendency not to comply with planning regulations. The notices are not only served on development which does not comply with planning permit conditions but also on development which is illegally constructed without permit.

Additionally, **TABLE 3.9** indicates that since 1993, less than 35% of the enforcement actions were resolved. This implies that either the resolution process is inherently too slow, thus eroding into the effectiveness of swift enforcement action. Alternatively, the system is being abused to lengthen the process in order to delay eventual action.

**TABLE 3.9****ENFORCEMENT CASES IN GOZO  
(1993-2000)**

Source: Planning Authority- \* Note: figure for year 2000 updated till 1/08/2000.

All in all there are two contrasting views on planning enforcement. One indicates that enforcement is undertaken with unnecessary vigour, thus hampering development. The other view indicates that enforcement in Gozo is ineffective because results are not seen. The need for enforcement to be more visible and tangible on the ground and the need for the enforcement action determination process to be considerably shortened are identified as definite issues.

### 3.7 Gozo and the European Union

Malta has applied to join the EU in 1990. At the time of writing of the report, negotiations on various chapters are still in progress and therefore it is at this stage impossible to elaborate on the parameters that will have an impact on development in Gozo. Definitely, from a land-use point of view, the most important impacts will be related to agriculture. However, there are clear indications that if Malta joins the EU, the population of Gozo would very much like to

acquire an island region status<sup>18</sup> in order to benefit from EU resources<sup>19</sup> which would help to offset problems related to double insularity and would thus promote the greater generation of wealth. Another area which is most likely to have a considerable influence on land-use<sup>20</sup> is environmental protection. Gozo is incommensurably rich in terms on natural and cultural heritage and EU policies could be beneficial to safeguard this heritage more effectively.

### 3.8 Socio-economic Implications

The impact of man on Gozo and Comino has been going on for several millennia. The interaction of human activities with their environment has also given the islands their current landscape. More recent human activities tend to leave a more conspicuous imprint on the landscape and change tends to occur faster.

It is widely appreciated that Gozo has a unique character which needs to be conserved. However, it is also known that interventions are necessary in order to support the requirements of the inhabitants and visitors to the islands. The interaction of man with the landscape therefore needs to be well understood so that conservation and development are reconciled to be complimentary rather than conflicting. Population, employment, housing requirements, infrastructure provision, commerce, recreation, agriculture and conservation arise out of human needs. It is thus important to understand, and where possible, quantify aspects of socio-economic indicators so that the planning process is developed with broader perspective of the human needs as the dynamic motor of change on the islands.

The information indicated in this chapter will therefore be used in other chapters wherever the need to do so arises. For example demographic data is fundamental to establish provision requirements for social and community facilities. Other socio-economic information may be similarly utilised.

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<sup>18</sup> This has been expressed by the Minister of Gozo, Hn. Giovanna Debono and various other Gozitan speakers on various occasions including the seminar on the Effects of EU membership on the Island Region of Gozo held on 28<sup>th</sup>. January 2000 and the Gozo Business Chamber Annual Conference held in March 2001

<sup>19</sup> Prime Minister Edward Fenech Adami during the seminar “The Effects of EU membership on the Island Region Region of Gozo”, proceeding published in literature by same title (editor Profs Lino Briguglio), published by Gozo Business Chamber and University of Malta, seminar held on 28<sup>th</sup>. January 2000 in Gozo. (p.7)

<sup>20</sup> *ibid* (p.8-9)

## 4. SETTLEMENTS

### 4.1 Introduction

#### 4.1.1 Outline

Man has left his mark on Gozo on two main ways. The urban settlements indicate where the main residential, administrative, social and community, commercial, recreation and industrial buildings and facilities are concentrated. The rest, being mainly agricultural, is reflected through a landscape which is predominantly moulded by man through traditional cultivation practices.

This chapter is intended to highlight the main features of Gozo's urban settlements in order to portray the relevant qualities that need to be taken into account in the local plan. For the purposes of this chapter, the area that is designated for rural development and the whole of Comino are not considered.

#### 4.1.2 General Planimetry

Urban settlement patterns in Gozo are characterised by some features which distinguish them from development on mainland Malta. Most Gozitan settlements are characterised by ribbon development along roads. In most cases however, it is difficult to identify the settlement and spatial hierarchies just by a casual examination of the planimetry. For instance settlements such as *Santa Lucia*, *San Lawrenz*, *Ghasri*, *Munxar*, *Kercem*, *Sannat*, *Xewkija*, *Qala*, *Zebbug*, *Marsalforn*, *Xlendi* do not have a planimetrically well identified settlement core area. In most of these cases, the location of the central area can only be determined through the presence of larger individual buildings (such as the parish church), open spaces (usually in front of churches) and more compact development along the routes around the central area. At the edges of these settlements, development along the routes tends to be interrupted by undeveloped land. In the case of *Gharb*, ribbon development is still predominant, however a development pattern radiating from the piazza in front of the church is evident. In *Xaghra*, streets radiate from a central piazza but the pattern is lost the further one goes away from this area with prominent finger-like ribbon development occurring at the edges of the settlement. *Nadur* is also planimetrically peculiar as the old settlement radiates planimetry together with a quasi-grid iron pattern emerging from the same central piazza. *Zebbug*, on the other hand, consists of two contiguous tear-drop shaped masses of settlement linked by a single road. In the latter case, there are no planimetric finger-shaped protrusions.

#### 4.1.3 Rabat / Fontana and Kercem

*Rabat*, *Fontana* and *Kercem* are considered as a special case in the Gozo planimetric scene. Street patterns clearly radiate from the piazza at *It-Tokk* which divides the fortified settlement at *ic-Cittadella* on the North from the *Borgo* on the South. The settlement pattern at *il-Borgo* is very clear as it is characterised by very narrow jagged street patterns some of which terminate in alleys. Street patterns around the older part of *Rabat* tend to become more

regular but the radiating pattern from *it-Tokk* is evident right to the periphery of the settlement. A small break in development intensity can be found on the south-western flank of *Rabat* where the link between the Gozitan capital and *Kercem* occurs. Planimetrically, *Fontana* and *Rabat* merge into one another. In the *Rabat / Fontana / Kercem* case, development tends to be more punctuated at the edges of the settlement.

## 4.2 Policy Context

The Structure Plan for the Maltese Islands has a number of policies relating to settlements and how these may be developed during the term of the plan. Possibly the most important strategic policy for Gozo which relates to settlements is not explicitly stated as a single policy but is inferred from the Key Diagram annexed to the Structure Plan. This diagram indicates Gozo and Comino as Rural Conservation Areas (RCA's) and this implies that the spread of existing settlement is limited by restrictions on residential and other types of development in areas Outside Development Schemes (ODZ). The main general Structure Plan policies which guide the development of settlements are found in policies **SET 1 to SET 12**. The general thrust of these policies is to limit development to areas within existing and committed areas and thus prevent further urban sprawl.

## 4.3 Built Urban Spaces

### 4.3.1 Ribbon Development

The preponderance of ribbon development results in a number of observations which can be perceived by walking through or living in these settlements. These can be summarised as follows:

- a) Commuting through ribbon development gives the impression that the settlement is larger.
- b) From street level the development is perceived as being more intense than it actually is.
- c) Commuting between points within the same settlement is rendered longer.
- d) Most of the back elevations of buildings have direct visual access to the countryside. The effect is usually enhanced by the buildings lying at the edge of an elevated area. These factors render ownership of most Gozitan houses desirable.

In most cases settlements have still kept their distinction and have not merged with other settlements. It is important that this situation is maintained. Otherwise, even if proportionately small areas of Gozo are developed along the routes linking the main settlement, the element of distinctness would be lost and the appreciation of the renowned Gozitan landscape would be significantly impaired.

#### 4.3.2 Consequences of Ribbon Development

It is important to note that in the case of Gozo, the edges of most settlements are not accessible to the public and within built-up areas, most long distance views can only be appreciated by private individuals. The strategic route from the port at *Mgarr* to *Rabat* is only punctuated twice by non-developed tracts, giving an impression to the new visitor of a rather more urbanised Gozo. It is important to note that most visitors appreciate Gozo for its landscape, culture remoteness qualities rather than for its newer urbanised areas.

There are also less evident effects of ribbon development. Servicing the community is less economically efficient as the distance of the centre of gravity of infrastructure is artificially increased. Thus, besides services needing to be installed for longer distances (therefore a heavier capital outlay), more losses are encountered for example in water pipes (pressure) electric cables etc. Even in examples such as the location of primary schools which are preferably situated within walking distance from the centre of gravity of the school-going population, ribbon development may preclude more desirable options.

The foregoing notwithstanding, the topography of Gozo must be taken into account when considering settlement patterns. Given that it is easier to commute along a level surface than along an undulating or steeply sloping terrain, a number of settlement patterns in Gozo have developed on ridges or along ridge-lines. In this respect, *Xaghra*, *Nadur*, *Zebbug* and *Munxar* are clear examples of the foregoing.

#### 4.3.3 New Development on Bays and Ridges

As indicated in **Chapter 2**, Gozo is a hilly island with a number of mesas dominating the landscape. A number of settlements have developed on these ridges and inevitably these have left their mark on the Gozitan skyline. Traditional Gozitan buildings are generally one to two stories high. Residential dwellings tended to be dwarfed in comparison to the parish church that normally dominates the skyline. The elevational platform provided by the ridges also rendered churches even more conspicuous. Additional noteworthy elements include windmills and watchtowers. Windmills were almost invariably located at the edge of a settlement to catch wind undisturbed by the urban texture. For strategic reasons, watch-towers were located on high ground at the edge of ridges as these spots command much greater viewsheds. In general terms, the traditional settlements made a positive contribution to the Gozitan skyline as the architecture complemented the surrounding terrain and the use of local stone visually translates as continuity with the underlying and surrounding un-built land.

In more recent times, the introduction of architecture which is significantly curtailed in articulation, deficient in correct proportioning and the introduction of alien materials colour and texture, has resulted in additions to the Gozitan skyline which are discordant with the pre-existing surrounding urban texture. The newer materials in general also led to bolder but monotonous designs and this trend tended to visually aggravate matters. Problems also arose through the inappropriate location of some of the more aesthetically disturbing structures.

#### 4.3.4 **Marsalforn and Xlendi**

*Marsalforn* and *Xlendi* represent two case studies of how urban planning and design should not be undertaken. Both locations lie on one of the few coastal areas in Gozo which has relatively easy access. The two areas also offer spectacular scenery in terms of countryside and sea-views and lie along a prominent watercourse. In the late 80's and the early 90's, pressures to develop these areas, for tourism related and second home accommodation purposes, mounted. The result was a cacophony of discordant development which had no sense of proportion, using large apertures and balconies and with little attention to architectural design measures to mitigate impact.

Large blocks of flats now dominate the steep slopes at *Xlendi* and multi-storey buildings occupy the formerly picturesque settlement in this area. The net result was that the area became overdeveloped, the only redeeming feature being totally co-incidental; the relatively high terrain visually secludes the resultant development from most areas in Gozo. *Marsalforn* has not been so secluded and is easily visible from *Zebbug*, *Xaghra* and part of *Rabat* but again fortunately due to higher terrain, the impact has been restricted to this area and is partially compensated by pleasant intervening countryside views. The contrast can be easily seen at *Qbajjar* which lies due west of *Marsalforn*. The western part of *Marsalforn* is dominated by characterless multi-storey apartment whilst those at *Qbajjar* still retain modest dimensions. The intervening break in development between *Marsalforn* and *Qbajjar* merits special attention in view of its importance as a green gap between the two settlements.

#### 4.3.5 **Ridge Edge Modern Development**

Apart from the architectural cacophony at *Marsalforn* and *Xlendi*, the modern introduction of multi-storey apartments at the edge of some of the ridges has been particularly offensive from a visual point of view. The edges of *Zebbug*, *Xaghra*, *Nadur* and *Qala* are dominated by stretches of considerable break of slope. These edges are often characterised by steep escarpments which are in turn underlain by steep clay taluses. Built-development has been taken to the edge of the ridges and the difference in level has in some areas been exploited to incorporate more levels on the back facade. The viewshed advantage of the ridge edges has also made property in these areas more desirable and hence pressures on development mounted. Hence developers incorporated even more levels to maximise on the potential of the sites. Setback, distancing from the edge, landscaping, articulation of the facade and the use of dark earth colours were generally not employed as mitigation measures. The result was that the lower and more pleasant village core was in some areas visually obstructed whilst the over-powering presence of tasteless elevations sprouted above the underlying picturesque landscape. It is essential that such mistakes are not repeated in future and that visual mitigation measures are employed onto the offensive structures to at least partially mitigate the damage done.

#### 4.3.6 Public Housing

Public housing in Gozo is very confined. The only public housing in Gozo lies at *tac-Cawla* at *Rabat* which lie on the southern side of *Rabat (Victoria)* in Gozo. This consists of fourteen blocks which are 4 storeys high. The architecture of these buildings, the fact that they are higher than the surrounding buildings and that they lie close to the settlement perimeter implies that their negative visual impact is rendered even more conspicuous.

Other home ownership schemes exist in Gozo. Where government built maisonettes or where flats exist, these tend to overshadow surrounding buildings by virtue of the mass and design. Again such buildings tend to be located at the periphery of the relevant settlement and this increases their conspicuousness in relation to the rest of the built fabric.

### 4.4 Urban Open Spaces

#### 4.4.1 General Characteristics

In common with Maltese historic centres, Gozitan village cores are characterised by winding streets, often with non-parallel building facades which sometimes widen to form a small piazza. Practically all of the main churches in Gozo have a small piazza in front of the church. This urban open space is often the focus of outdoor village or town activity. The piazzas also constitute the centre of activity of the annual village festa and often the more prestigious civic and ecclesiastical buildings are also situated along this prestigious urban space. In larger settlements, the location of bars, band and political clubs along a piazza also makes them the focal point for social interaction. Prominent people of the Gozitan society also show a preference to reside near to the settlements' main piazza.

#### 4.4.2 Morphology

The morphology of the main Gozitan piazzas is variable. At *Qala*, for example, it is wedge shaped and regular in shape with the larger dimension flanking the western side of the parish church. The *Nadur* church is flanked by a larger wedge shaped piazza on its western flank and a smaller more confined triangular open space on its southern flank. The *Ghajnsielem* parish church has substantial open spaces along its north-eastern and southern perimeter with the north-eastern open space being the predominant one. Once again the shape of this piazza is rather rectilinear. *Xaghra* has a rather curious quasi-rectangular piazza elongated towards the south-west and lying directly in front of the main church facade. There are two main rectangular piazzas flanking the *Xewkija* rotunda. The smaller one faces a northerly direction whilst the larger faces a north-easterly one. The church at *Xewkija* lies at the intersection between these two open spaces. The parish church at *Sannat* is also surrounded by a rectangular shaped piazza with the church itself occupying the southern part of the rectangles leaving two wide corridors on its eastern and western flanks. The piazza at *Munxar* is rather interesting. Whilst being trapezium shaped with the wider end facing south-east, the tapering end gradually narrows down towards the south-west. A roughly rectangular open space also occurs at the north-eastern end of the indicated trapezium shaped piazza. At *Zebbug*, the main parish piazza has the shape of a scalene triangle which very gradually tapers towards the south west. The main piazza at *Gharb* also has the shape of a scalene triangle pointing towards the south-east. However in this case, two other smaller scalene shaped open spaces occur due

north and north-west of the *Gharb* parish church. The main piazza at *Ghasri* is a very rough rectangle bound mostly by rectilinear frontages. The piazza is roughly oriented towards the south-east. The church at *San Lawrenz* is another predominantly rectangular shaped piazza oriented towards the south-east with tapering appendages on the south-western flank of the church and another one linking with the main road leading to the village.

The three smallest main church piazzas in Gozo are those at *Santa Lucia*, *Kercem*, and *Fontana*. The piazza at *Santa Lucia* is roughly rectangular in shape with the longer axis oriented towards an easterly direction with the church facade lying at an angle to the western short end. The open space in front of the *Kercem* church is roughly rectangular in shape. However the ratio of the longer end to the shorter side of the rectangular space is quite high. In fact this piazza seems more like a widening of the village route network rather than a more conventional piazza but it serves the same functions. The open space in front of the main church at *Fontana* is very restricted. It is roughly square in shape with the road gently narrowing towards the north and south-west.

*Rabat*, the capital city of Gozo, has two main churches namely the cathedral church and the parish church of *St. George*. The Piazza in front of the Cathedral church is roughly trapezoidal in shape with the cathedral lying at a slight angle to the open space. The piazza in front of the parish church of *St. George* is a very rough rectangle oriented towards the north. Three points of this rectangular space taper gently onto the leading narrow streets.

The main piazzas in front of the parish churches are not the only open spaces in Gozo. In *Rabat* for example, these are a number of relatively larger piazzas such as those at *It-Tokk (Misrah Indipendenza)* where an open air market and open-air cafeterias can be found and that in front of the church of *St. Francis*. The widening of *Triq ir-Republika* due east of *It-Tokk* and the odd shaped *Pjazza Santa Sabina* also serve as social and community magnets. Apart from other piazzas in *Rabat*, other settlements in Gozo have a number of open spaces ranging from gentle widening of a stretch of the carriageway to clearly defined open spaces which occur throughout the urban fabric. Unfortunately, the more modern additions to the main settlements in Gozo often give little attention to the role of open spaces with the consequence that the resultant open spaces are more often thrown in for good measure rather than being designed as quality spaces for social interaction.

#### 4.4.3 Problems of Public Open Spaces

Whilst the function of the various public open spaces is widely acknowledged to be important, architectural details, especially those relating to the pavement, leave much to be desired. One of the largest open spaces in Gozo (the *Rabat* car-park) is an open-air parking area. Another substantial open space at *Mgarr* Harbour used by vehicles waiting to board the ferry, as a car-park for Gozitan employees working in Malta, as parking for people using or working in the *Mgarr* harbour area as well as a recreational space during week-ends. Moreover, most of the traditional piazzas have in turn become glorified car parks. Whilst the use of the car is clearly necessary in modern life, it does not make positive scenic contributions to either the open space or the surrounding architecture. The surface of the majority of the

piazzas in Gozo consists of a usually well-designed parvis surrounded by a lake of tarmac. The increase in derelict buildings is also leaving a negative impact on some piazzas although this is partly offset by commendable rehabilitation initiatives. Clearly, such important open spaces merit a much more appropriate architectural attention.

#### 4.4.4 **Green Amenity in Urban Open Spaces**

The use of small scale green elements and ancillary outdoor furniture is very much lacking in many of the Gozitan open spaces. Ironically, there is little greenery in most Gozitan urban spaces. In *Rabat* for example, substantial soft landscaping is employed only around the main car park, *Pjazza San Frangisk*, *Pjazza Indipendenza (It-Tokk)* and *Pjazza Sta. Sabina* with limited pockets in other areas. *Rabat* is the only settlement in Gozo which boasts a notable public garden (*Rundle Gardens*). Otherwise there is a perceived lack of trees in many open urban spaces. Even small trees in pots would in many instances provide a welcome addition to the Gozitan urban environment, provided that these do not compete with the more notable architectural features and do not cause undue disruption to piazza related activities. In all cases, the pavement of the various open spaces merit to be treated with much greater design awareness and architectural attention. Although the size and use of some public open spaces may preclude the employment of some soft landscaping elements, in many instances it may be possible through the incorporation of appropriately designed and located flower pots to add a touch of green to an otherwise sterile looking urban landscape. To this effect, the sensitive and tasteful use of flower baskets or plant pots may be considered on some facades.

## 4.5 Promenades

### 4.5.1 **Importance of Promenades**

Accessible coastal areas are very important to Gozo because they facilitate access to water and water related activities. Thus they are important for recreation, tourism and to conduct maritime related activities. Coastal promenades thus have the advantage of rendering the visual qualities of the area accessible to the public, to create additional public amenity, as a point of observation for the land and marine activities being undertaken and as a site for social interaction and relaxation.

### 4.5.2 **Overview**

The largest promenades in Gozo are those at *Marsalforn* and *il-Qbajjar*. These provide a welcome break from the mass of development which occupies *Marsalforn* area and present uninterrupted views northward towards the sea. Many people can be strolling and taking in these areas especially in fine winter weekend afternoons. The promenades also present an opportunity for walking along the coast from *Marsalforn* to *il-Qbajjar* but some of the walking has to be done on the carriageway. A smaller promenade can be found on the southern flank of *il-Bajja tax-Xlendi*. This also gives the opportunity for small walks along the coast. The facilities in this promenade are less well developed than those at *Marsalforn*.

The breakwater arm at *Mgarr* in Gozo also serves the function of a promenade along Gozo's main port. There are no opportunities (with the exception of the area near the harbour navigation light) for looking out towards the sea on this promenade since a concrete wall

precludes this. But enough activity is generated within the port to generate interest in walking along the structure. The elevated position of this “promenade” with respect to the *Mgarr* parking area renders the experience even more attractive but unfortunately the area is very restricted.

There are other areas along the coast where walking along the coast is possible but this can be done on natural or semi-natural terrain rather than on paved public coastal walk. These walks are less frequented but are much more challenging and the scenery that is encountered along the way is generally breathtaking. These informal walkways will be treated separately in **Chapter 14** which relates to Rural Conservation.

## 4.6 Policy Approach

### 4.6.1 General

Settlement patterns in Gozo are distinctly different from those in Malta. Ribbon development predominates in Gozo. Topography, culture and historical reasons have moulded this kind of development. Most of the settlements in Gozo have also retained their physical identity. The generally low-lying development profile especially of the smaller Gozitan settlements has given characteristics that are highly sought after, especially by expatriates. Given the appreciation of these picturesque qualities as well as their economic potential, endeavours should be summoned to retain as much as possible of those characteristics which render these settlements so special.

### 4.6.2 Outline Scenarios

The time frame of ten years envisaged for the local plan is a rather lengthy one. It is impossible to predict all the variables and likelihoods that will occur over such a long time frame. However, three main decision directions are contemplated and the respective envisaged resultant scenario is highlighted below:

**a) Leave everything as is:**

**IMPLICATIONS:** - no overall improvement to encourage a better quality of life. If no action is taken, the tendency is towards degeneration, as whilst traffic increases, the road network remains the same. Consequently, dilapidation takes place and open space amenities are eroded. The resulting ambience would discourage investment with the eventual rundown of the settlements.

**b) Undertake radical development including disruption of existing street patterns in order to accommodate new development and free carriage-ways to take more traffic and parking.**

**IMPLICATIONS:** - The special character of Gozitan settlements is destroyed and Gozo loses its charm. Sense of place is lost together with the associated spatial identity. Tourism related commercial activities suffer as the attractor features are removed. Even expatriates and Maltese who have invested in Gozo property are likely to lose interest and look elsewhere. The venture would also involve very substantial capital expenditure with little prospect of recouping the expense.

- c) **Sensitively utilise vacant dwelling within the existing settlements as a priority and then utilise the considerable tracts of land within the existing development schemes.**

**IMPLICATIONS:** - The special character of Gozitan settlements is ameliorated. Community life encouraged, more economic activity encouraged. Special arrangements have to be undertaken to regulate traffic and parking especially in *Rabat*.

Any proposed changes to settlement patterns must examine the implications of those changes to the existing settlement patterns and whether these modifications are desirable or otherwise. The interrelationship between the existing settlement patterns and any proposed changes should also be examined in terms of over-development, traffic generation, loss of amenity, relationship to surrounding development and features, and conflict with areas or sites of conservation value.

It is also important that whatever intervention are undertaken, the human element is taken into consideration and given priority. For example, it is quite pointless to intervene in a settlement and incur expenditure if the resultant settlement does not meet the expectations of the inhabitants. This may result in residents leaving the area or built infrastructure remaining under utilised. If there is little incentive for maintenance of a settlement, the same settlement will eventually undergo dereliction. Furthermore, an urban space must generate a minimum amount of human activity to be attractive as a communal space and to be economically viable.

#### 4.6.3 Objectives

From Section 4.6.2, it is clear the option 4.6.2 a) is not a feasible option to pursue as it would entail the gradual deterioration of the built environment stock. Option 4.6.2 b) is much more interventionist and in certain cases may improve upon existing problems such as traffic circulation. However, there are two main problems with this option. The first is that it would entail the destruction of cultural heritage within urban conservation areas to the detriment of the tourism industry. This option would also cause considerable disruption to neighbourhoods over a long period of time. Option 4.6.2 b) is also very costly by virtue of the scale of the intervention and the requirement to provide alternative accommodation during construction. Therefore, this option is also discarded. Option 4.6.2 c) proposes a more gradual approach with the development respecting the existing cultural heritage and therefore does not negatively effect the economy or quality of life in Gozo. This policy option is also in line with Structure plan policies indication containment and better utilisation of existing urban infrastructure.

The following key objectives for settlement patterns have been identified as a basis for policy generation:

- To retain the various settlements in Gozo physically distinct from one another.

- To encourage the maintenance of the traditional settlement patterns in Gozo.
- To maintain street alignments in Urban Conservation Areas.
- To maintain the existing open spaces within urban areas.
- To render urban public open spaces more accessible to pedestrians.
- To sensitively employ more soft landscaping in urban areas.
- To encourage the use of traditional materials on the facades of buildings especially in Urban Conservation Areas (UCA's).
- To give special attention to development on ridge edges and at the edge of development schemes.
- To maintain free and unhindered access on promenades and to continue to embellish them.

## 5. HOUSING

### 5.1 GENERAL SITUATION

Land to accommodate residential dwellings features prominently in any development with addresses settlements. In Gozo, most of the residential dwellings occur as terraced houses with a smaller proportion of apartments / maisonettes, semi or fully detached villas and houses of character<sup>21</sup>. There are a number of institutions which accommodate several persons under one roof but these cater for only a very small proportion of the Gozitan population.

Housing within settlements in Gozo can be very broadly categorised into two large but only fuzzily distinct groups. The older housing tends to date before the mid-1900's and is very variable in terms of internal planimetry, size and architectural treatment. Building around a central courtyard is not as predominant in such housing as it is in mainland Malta. In some areas, there is a tendency for backyards to be substantially large. The older houses tend to be predominantly one or two storeys high.

Dwellings constructed in the latter part of the 20<sup>th</sup>. Century tend to have more similar dimensions (around 150-200 sq. m. footprint), are generally rectangular in shape and generally have a back garden at ground floor level. The architecture of the facade tends to be dominated by larger apertures. Apartments are usually three or more storeys high and when the building occurs on a steep incline, the difference in levels is normally exploited to incorporate more levels. Three storey, four storey and higher residential dwellings at *Xlendi* and *Marsalforn* predominate. The multi-storey dwellings are generally occupied tourists or are leased to Maltese for short periods of time. A proportion of these dwellings are also used as second homes by Gozitans or Maltese.

The distinction between the two groups is far from clear as re-development of the existing housing stock has been continuously taking place. Individual preferences and means have played a significant role in the design of the various houses.

### 5.2 Policy Context

#### 5.2.1 General Policies

General Development policies on Settlements were already outlined in Chapter 2 of this report. As far as residential dwellings are concerned, these are directed to continue to be developed within boundaries indicated for development of the urban infrastructure. In Gozo, clusters or isolated units of residential development also occur Outside Development Zones. In such cases, these are either a result of policies operating prior to the enactment of the Structure Plan or happening after an area ODZ is committed as a result of planning decisions. However, in general terms, residential development in Gozo remained confined within the “Temporary Provisions Schemes” as indicated by the strategic policy.

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<sup>21</sup> Inferred from land-use survey and SPU statistics on housing.

### 5.2.2 Specific Policies on housing

The Structure Plan for the Maltese Islands sets out the policy context for the development of housing in Malta. The main direction applicable to both islands is to encourage the development and redevelopment within the areas indicated for residential development, thus curtailing further expansion into rural areas (**SET 1**). Special attention is given to rural conservation areas whereby whilst occupation of vacant or under-utilised buildings for housing purposes is encouraged, sensitivity is shown to the architectural merits of the building in isolation and relative to its context within a streetscape (**HOU 2, UCO 1, UCO 6**). Policy **HOU 3** directs Local Plans to include *specific policies for the development of residential property and to include mandatory rules and advisory guidelines concerning densities, building heights, design, parking and other standards appropriate to particular localities*. The same policy also advises against long-term land banking in areas ripe for development. Policy **HOU 4** on the other hand indicates that until such time that the local plans are adopted, policies **BEN 1,2,3** and policy **BEN 4** will be applicable. The Structure plan also advises in favour of an equitable rental market in policy **HOU 7**. All the foregoing policies are equally applicable on both islands.

When addressing social housing, the provisions of the Structure Plan are again equally applicable to Mainland Malta as well as Gozo. Policy **HOU 8** for example encourages the private and voluntary sectors to participate within a rent market. After a period of eight years, the necessary climate for such involvement has not yet materialised. On a similar note, policy **HOU 9** encourages new Government built rental housing optimally located within areas designated for residential development. The same policy also states that the establishment and growth of subsidised shelter housing for sale and rent by the private and voluntary sectors would be promoted<sup>22</sup>. Whilst on general terms, most new Government housing did occur within development schemes, during the operation of the Structure Plan, little interest was expressed from the private and voluntary sectors to actively participate in social housing ventures. The proposal in **HOU 10**, that is, to encourage the sale or rent of lower standard tourism accommodation for housing purposes, did take root especially in areas like *Marsascala* and *Qawra* in Malta. The indications are that it is also slowly taking root in areas like *Marsalforn* and *Xlendi* in Gozo. The rent market for such property is still dormant except on very short lease terms which to all intents and purposes can be considered as tourism related.

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<sup>22</sup> Draft report: Malta's future housing requirements 1995-2010, para 28 p. 11

## 5.3 Issues

### 5.3.1 General

The availability of housing on the market depends on a number of factors. These factors can be classified into two broad categories namely:

- a) physical availability
- b) non-physical availability

Physical availability is easier to address as it refers to the housing stock that is physically available for residential purposes. This includes land on which residential units are permitted by planning legislation, the existing vacant dwelling stock and existing buildings which can be converted for residential purposes. This kind of housing stock can, to a certain extent, be quantified. The role of the Local Plan is to ensure that, based on reliable projections, there is a sufficient physical housing stock for the duration of the Local Plan.

The term “Non-physical” is applied mainly to housing availability either on the market or else through other mechanisms. In the absence of implemented regulation, there is little relationship between physical and non-physical housing availability. Even if there is physical oversupply in the dwelling housing stock, if the asking prices are too high or there are no willing vendors or hirers, to all intents and purposes, the dwellings are not available to a substantial portion of the population. From a planning point of view, the existence of a substantial physical housing oversupply that is not available on the market, represents a considerable wastage of land-resources. The Local Plan will therefore encourage better use of the existing schemed land and housing supply.

### 5.3.2 Land Availability

Studies on land availability in Gozo have confirmed that considerable amounts of vacant land within the temporary provisions schemes remain undeveloped in spite of being available since 1988. In some Local Councils, more than half the land available for development remained vacant. Given that the population of Gozo is not envisaged to increase substantially within the local plan period and given that the number of returned migrants is also decreasing, it makes perfect sense to better utilise land within the extant areas earmarked for development rather than resort to extending the schemes. Furthermore, in the absence of enforceable measures that will ensure that areas earmarked for development are actually developed within the local plan time-frame, it is envisaged that the current problems of vacant land within urban areas will only be exacerbated if addition virgin land is rendered available for development.

It also transpires from population projections (see **Chapter 3**) that no major increases in the population of Gozo are envisaged. Nor are major migration shifts from Malta to Gozo expected to occur. Furthermore, the rate of settlement by expatriates or returned migrants has shown a downward trend and this trend is not envisaged to reverse. Demographic projections indicate that between 1995 and 2010, the population of Gozo and Comino will increase by around 3,000 persons. Assuming a household size of 2.62 persons per household (non-

conservative estimates), and a population of 30,529, then a total of 11,652 dwellings would be required<sup>23</sup>. Existing inhabited dwellings account for 10,232 households implying that during the Local Plan period, **1,419 new dwellings will be required**<sup>24</sup>. Considering only existing undeveloped land (which is schemed for development) and assuming that 90% of it will be available for housing, then it is possible to estimate the amount of undeveloped land required for new housing provision and whether this would suffice throughout the duration of the local plan. A total of more than 91.2 hectares of land within scheme was recorded as being undeveloped in 1998 (excluding land which was under construction at the time.) If it is assumed that the average dwelling size footprint is 150 m<sup>2</sup>, then of 90% of this available land is developed, then 5,473 average sized residential units could be provided within the as yet undeveloped land within scheme. **This represents a factor of 3 times more than what is envisaged to be needed (through non-conservative estimates).** This estimate assumes that future households would be less intensely occupied than the current households (due to less marriages, more people living alone, separated persons etc.) Furthermore, the calculations only take into account non-developed land within schemes and do not consider the very substantial percentage of vacant or under-utilised dwelling stock in Gozo (see 5.3.3). It must also be borne in mind that in certain areas, development of up to three floors has been allowed and this permits the development of a number of residential units on the same footprint. Moreover, more intensive use of land resulting (mainly) from increasing property values, has not been taken into account in the foregoing estimates. The statistics also exclude dwellings which lie Outside Development Zones (ODZ) (eg. hamlets, farmhouses, tourist complexes, *Chambray* etc.). It is also interesting to note that in the period between 1988-1998, only 17% of the “new” areas schemed for development during the indicated 10-year period, has been developed.

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<sup>23</sup> The subject study on demography indicating a slightly more conservative figure of 11, 214 households by 2010. (see Table 23)

<sup>24</sup> Note that this figure is close to the high estimate envisaged in Table 6.1 of the Explanatory Memorandum p.28...but that figure covers years 1990-2010 rather than 2000-2010 as envisaged in the local plan horizon.

**TABLE 5.1**  
**LAND AVAILABILITY IN GOZO**

Local Council	Area within TPS (exc. Ind. Estates etc)	Vacant excluding under construction @ mid-1998	Vacant including under construction @ mid-1998 (within scheme)	Land (building areas only) schemed in 1988	Land (building areas only) constructed 1988- 1998 within scheme
Fontana	164,393	9936	10175	47701	7028
Ghajnsielem	653,960	111058	131311	192348	55815
Gharb	401,123	52091	56971	103022	26489
Ghasri	153,027	21386	23911	45039	10552
Kercem	348,301	35388	37744	132627	11730
Munxar	293,659	27263	36004	67771	19727
Nadur	956,336	143318	159065	269364	43495
Qala	518,706	98196	110951	118374	25515
Rabat (Victoria)	1,187,290	84142	108241	494208	47339
San Lawrenz	168,570	20433	23293	49397	4104
Sannat	405,629	27459	29499	124355	12144
Xaghra	1,090,100	111277	132210	273332	37879
Xewkija	906,320	129770	131784	292525	83423
Zebbug (Ghawdex)	558,484	40492	55347	154890	34566
<b>TOTALS</b>	<b>7,805,900</b>	<b>912,209</b>	<b>1,046,508</b>	<b>2,364,952</b>	<b>419,805</b>

Source: Strategic Planning Unit 1998 revised by Local Planning Team 1999

### 5.3.3 Availability of the Current Housing Stock

Various Local Councils<sup>25</sup> have complained about shortage of housing stocks but tangible evidence to this effect has not been forthcoming. Whilst various parties indicated that young couples find it difficult to acquire property (rental market in the Maltese Islands is practically dormant) it is acknowledged that there are substantial portions of land within schemed areas which remain undeveloped (see section 5.3.2). Furthermore, a large number of houses within settlements remain vacant. The overall percentage figure for vacant dwellings in Gozo is the highest for a local plan area in the Maltese Islands. Indeed, surveys<sup>26</sup> indicate that councils which accommodate tourism oriented settlements, experience a vacant dwelling percentage which exceeds 20% of the total housing stock. It has already been seen that a considerable amount of land within the temporary provisions schemes remain undeveloped. Reference to TABLES 5.2 and 5.3 indicate domestic water consumption for the years 1995 and 1998. For the year 1995, there is comparison with mainland Malta. In the case of dwellings registering no consumption, percentage wise, there was a factor of more than 2 and as half times when Gozo is compared to Malta. When considering partial consumption, in 1995,

<sup>25</sup> The Gozo and Comino Local Plan Team Meeting has undertaken at least two meetings with each of the fourteen Local Councils in Gozo

<sup>26</sup> SPU report Malta's Future Housing Requirements 1995-2010 (P.21)

figures for Gozo indicate 22% of dwellings whilst Malta indicates a figure of 18%. Thus for 1995, there was (percentage-wise) less utilisation of the existing dwelling stock than in Malta.

Considering Gozo on its own, in 1995, 13% of the dwelling stock reported no consumption whilst 22% indicated some consumption during one or two consumption periods. This indicates that some 35% of the existing housing stock is not continuously inhabited. In 1998, the number of households in Gozo which indicated no consumption decreased slightly to c. 11% whilst the number of dwellings which reported some consumption during one or two periods increased from 22% to 35%. This implies that between 1995 and 1998, whilst the totally vacant dwelling situation has improved slightly, dwellings registering 1 or 2 period consumption has increased by a staggering 61% (ie. from 22% to 35.4%).

**TABLE 5.2**

**COMPARISON OF UTILISATION OF DWELLINGS GOZO AND MALTA**  
(Water and Electricity Meters 1995)

ISLAND	3 Period Consumption	Some Consumption in 1 or 2 periods	No Consumption	TOTAL DWELLINGS
<b>Gozo</b>	10,604 (65%)	3,693 (22%)	2,099 (13%)	<b>16,396 (100%)</b>
<b>Malta</b>	112,004 (77%)	26,024 (18%)	8,073 (5%)	<b>146,101 (100%)</b>

Source; SPU data on Water and Electricity meters 1995<sup>27</sup>

**TABLE 5.3**

**UTILISATION OF DWELLINGS BY LOCAL COUNCIL AREA, GOZO**  
(Water and Electricity Meters 1998)

POPULATION	3 Period Consumption	Some Consumption in 1 or 2 periods	No Consumption	TOTAL DWELLINGS
<b>31,836</b>	9,575 (53.8%)	6,298 (35.4%)	1,928 (10.8%)	<b>17,801 (100%)</b>

Source : WSC water and Electricity Data 1998.

Various reasons<sup>28</sup> have been proposed to explain vacant urban sites and/or dwellings: These included:

- a) Problems associated with inheritance and multi-ownership.

<sup>27</sup> The data shows dwellings with continuous water consumption signifying habitation; dwellings with some consumption (even 1 unit of consumption) for 1 or 2 metering periods and therefor possible partial habitation, including summer residences; and units with no water consumption and hence vacant.

<sup>28</sup> Based on meetings which the Gozo and Comino Local Plan team has undertaken with various agencies and individuals.

- b) Expense in effecting repairs and/or modifications to existing dwellings.
- c) Difficulty to obtain planning permits to rehabilitate or rebuild dwellings, especially in urban conservation areas.
- d) Rent Laws.
- e) Unaffordable housing.
- f) Areas being retained for offspring.
- g) Aspirations to sell or lease property to non-Gozitans (especially expatriates)

Some Local Councils and the Chamber of Architects argued in favour of scheme extensions to encourage the younger population to stay within their council and to entice couples from other areas to settle within their locality. Some Councils argued that attracting external populations would render the maintenance of certain social and community facilities more viable. However, given that land is physically available in other councils and that projections indicate that the population of Gozo is bound to level off, it is not envisaged that extending schemes for residential areas will achieve the desired effect. Additionally, even if land was made available to this effect next to each particular council, there is no mechanism to ensure that the land would be developed within a pre-specified period of time or that it would be occupied by people from the particular Local Council. Furthermore, any extensions to the schemes would reduce even further the likelihood of the existing dwelling stock being brought into the market.

In the local context, it is a well-known fact that fresh land introduced for residential development purposes will not solve the current problems of land availability<sup>29</sup>. This statement is even more relevant to Gozo where the relative supply and percentage of undeveloped land is even greater than that for mainland Malta.

#### 5.3.4 Housing Condition

The problem of substandard housing in Gozo does not seem to be as acute as that in Malta. None of the Gozo local councils have indicated a sub-standard housing as a problem. Indeed, Housing Authority officials indicate that past requests for social accommodation in Gozo have only received very limited interest<sup>30</sup>.

A condition survey for certain areas in Gozo was undertaken in Autumn and Winter of 1999 by the SPU unit of the Planning Authority. A land-use survey was also undertaken by the Gozo and Comino Local Plan (GCLP) team in the early part of the year 2000. The general indications are that whilst constructed and inhabited buildings are generally well kept, older uninhabited dwelling within the Urban Conservation Areas tend to be neglected and dilapidated. Cases where buildings of considerable architectural and historical importance are left to dilapidate are not unknown. In the older part of Victoria, a significant proportion of the older houses has been converted on the ground floor for commercial use whilst the upper storeys either remain vacant or are used for storage purposes.

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<sup>29</sup> Paper by Anton Camilleri on Housing, at the Housing Affordability Conference as appearing in the Times of Malta of 2/02/2000.

<sup>30</sup> Meeting between high level Housing Authority officials and the GCLP team on 3/11/1999.

Various reasons were brought forward by the Local Councils<sup>31</sup> and other parties to account for dilapidation. Some have already been mentioned in **section 5.3.3** but there are others. These include:

- a) Problems of access through narrow streets
- b) Parking problems
- c) The non-availability of a garage close to, or incorporated with, the dwelling
- d) The relatively small size of some dwellings within Urban Conservation Areas.
- e) The considerable expense required to rehabilitate an old dwelling.
- h) The absence of a damp proof membrane resulting in humidity problems.

### 5.3.5 The Housing Quality Survey

In 1996, the Planning Authority carried out a Housing Quality Survey to establish the quality of accommodation. 496 interviews were carried out in Gozo. Taking into account the high vacancy rates and high proportion of vacant properties that need rehabilitating, it is evident from this survey that the occupied dwelling units offer relatively high standards of accommodation and services.

The survey has shown that 92% are owner occupiers compared to a national average of 73%. Results have also shown that the majority of dwellers prefer to live in terraced housing, this being mainly attributed to reasons of privacy. The largest group live in three-bedroom accommodation (50 per cent) with 15 per cent living in 4bedroom accommodation. It is perhaps surprising that as many as 29 per cent live in 2-bedroom accommodation. From the Local Plan Areas, Gozo has the smallest number of one-bedroom properties. However, it has the largest number of single garages per household surveyed; 63 per cent (compared to 39 per cent for Malta and Gozo) and the largest number of gardens per household surveyed, at 61 per cent as compared with 37 per cent for Malta and Gozo.

The problem areas are concentrated more on the immediate neighbourhood than with the housing itself. Over half the respondents (52 per cent) complained of poor road surfacing; 62 per cent were concerned about security and felt a police presence was lacking; 64 per cent considered heavy traffic in the streets a nuisance. Of all the Local Plan areas surveyed, Gozitans responded as being overall quite satisfied with the general quality of their housing - 87 per cent expressing satisfaction with their housing. Graded by interviewers, housing in Gozo scored 90% for general appearance, 92% for maintenance and 98% for satisfaction with dwelling. All these figures out-perform the average scores for Malta, which read 84, 86 and 91 per cent respectively. Finally, Gozo was identified as one of the major destinations for annual holidays by families living in Malta, scoring second only to *St. Paul's Bay* in frequency among respondents (*St. Paul's Bay* includes *Qawra* and *Bugibba*).

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<sup>31</sup> The factors have been condensed from minutes of meetings undertaken between the Gozo local Plan team, Local Councils and other agencies.

### 5.3.6 Housing Tenure

The 1995 Malta Census indicates Gozo as the region with the highest ratio of owner occupied housing. In fact, only 7.8% of the dwellings enumerated in 1995, were rented, the rest being either owner occupied (86.4%) or used free of charge (5.8%). This phenomenon also stifles household movement that would have ensured a steady supply of vacated dwellings. It also reflects a cultural trait of ownership as opposed to rental of the housing stock.

Given the existing very high owner occupied ratio as well as government policies which encourage owner occupation of dwellings, it is rather unlikely that the housing rental market will flourish in the foreseeable future.

### 5.3.7 Social Housing

If one considers the number of applicants currently registered on the Government waiting list for social accommodation, a total of 53 applicants from all localities would not appear to indicate a significant demand for public housing<sup>32</sup>. Many Gozo applicants expect to be allocated a 3-bedroom terraced house and anything less (eg. Maisonette) is not considered acceptable. In effect recent allocations remained substantially under subscribed.

On the other hand, land availability for social housing is limited and Government has to make the best possible use. Moreover, once Government policy in Malta is to provide maisonettes, it is highly unlikely that Government will adopt a different approach in Gozo with provision of plots for terraced houses.

Therefore, the position vis a vis social housing for Gozo is to restrict it to the provision of maisonettes of dimensions that are appropriate to social housing. Government or joint office land within areas schemed for residential development thus need to be safeguarded to this effect.

### 5.3.8 Property Acquisition by Maltese and Expatriates

Property acquisition by non-Gozitans affects the housing sector in a number of ways. Farm houses and houses of character acquired by Maltese or expatriates are rehabilitated or renovated. In the case of Maltese ownership, the properties are normally utilised as second homes as opposed to permanent residence. In the case of expatriates, the dwellings are either used as temporary residences or else by people who wish to settle in Gozo. This perceived demand does have an influence on supply of dwellings for Gozitans. However, given the number of properties which are partially or totally under-utilised and given the number of plots within development schemes which remain undeveloped, it is unlikely that the demand will adversely affect the physical supply of residential development. Furthermore, expatriates and Maltese normally seek houses of character or apartments; whereas Gozitans show a strong preference towards terraced houses. Therefore, the factors indicated in **sections 5.3.1 to 5.3.7** are more relevant to the availability of housing for Gozitans than property acquisition by Maltese and expatriates.

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<sup>32</sup> This fact has been confirmed during a meeting with high level representatives of the Housing Authority.

Government is currently considering proposals for the encouragement of further foreign resident settlement and acquisition of property by foreigners. Policy changes in this sector could effect various factors related to housing in Gozo including rehabilitation, vacancy, availability and prices.

## 5.4 Policy Approach

### 5.4.1 General

Various housing related studies indicate that there are differences between housing in Gozo and housing in Malta. A few of these differences include:

- a) Housing in Gozo is, in general, of a better quality than housing in Malta.
- b) Old slum areas in Gozo are almost non-existent.
- c) Demand for social housing in Gozo is very limited.
- d) Gozitans still strongly oppose the idea of living in maisonettes and apartments. Residential dwellings in Gozo are still predominantly townhouses, terraced houses and detached or semi-detached dwellings.
- e) Percentage-wise, there is relatively much more undeveloped or unoccupied space within development scheme than in mainland Malta.
- f) The Gozo region has the highest proportion of vacant dwellings in the Maltese Islands.

These factors notwithstanding, there has been considerable pressure to extend the boundaries of the current development schemes. In **Chapter 5**, various arguments have been brought forward which clearly indicate that the current problems relating to residential accommodation are not arising out of physical shortage of supply. The root of the problem lies with various socio-economic forces which are grossly distorting the market (see **section 5.3**). It is therefore these non-physical parameters that have to be addressed rather than increasing the supply. Otherwise, it is envisaged that if provision is further increased, current vacant properties will stand an even lesser chance of becoming occupied.

### 5.4.2 Scenarios

In view of the foregoing and subject to the following indicated courses of action, the following scenarios can be envisaged:

#### a) **No intervention whatsoever**

**IMPLICATIONS:** - No additional new property is injected into the market. Given that population projections (including inter-island migration, returning migrants and expatriates) indicates a slight increase in demand and that this demand can already be satisfied within the existing schemes, it seems evident that there should be no pressure to extend the development schemes. However the current situation points out that in spite of a considerable physical oversupply of developable land, the market is still operating under oligopoly conditions. Hence property is there but is not available. Therefore, some people will still find it difficult to find a new home. There is also a

slim chance of current undeveloped land within development schemes being developed unless more realistic market conditions are created. The same applies to vacant properties, especially those in Urban Conservation Areas. The envisaged result is that pressure will be maintained or even intensified to extend development schemes. Vacant properties continue to fall into disrepair and undeveloped land within schemes will only very slowly be developed.

- b) No extensions to the schemes to accommodate additional housing but measures undertaken to secure the utilisation of existing under-utilised properties and the development of vacant land within the existing development schemes.**

**IMPLICATIONS:** - Areas within development schemes have several advantages... in most cases they are already provided with the necessary infrastructure such as water, electricity, sewerage, telecomms and road surfacing. There is normally greater proximity to facilities such as churches, schools, offices, commercial establishments, civic facilities and other recreational centres. Development remaining compact may also encourage pedestrian as opposed to vehicular commuting in view of the shorter distances involved. Conversely, newer settlements, whilst possibly having more parking provision, generally lack the external activity associated with the established areas. There is no loss of precious agricultural land, ecologically sensitive areas or areas of high scenic value.

- c) Provide additional residential accommodation outside the existing development schemes.**

**IMPLICATIONS:** - Newer settlements will definitely modify the picturesque quality that most of the settlements have managed to at least partially retain. Precious and scarce cultivated land, garrigue and scenic areas are all likely to be casualties of such a decision. Greater physical provision to an already physically oversupplied situation will mean that more properties will remain vacant and developers who have invested in property and who have as yet not managed to find a market for it, will find it much more difficult to do so. Additionally, if the present public policy and market situation prevail, there is no guarantee that prices will come down and that the “new” buildings will be occupied. The market may simply be flooded with yet another wave of vacant properties. Distances to essential services will also increase in view of generally greater distance from centre.

The policy scenarios above clearly indicate that encouragement of optimal use of property within existing development is the most sensible route to take. The policy direction for housing should therefore be to continue development within the existing schemed areas. This is also in line with current Structure Plan policies **SET 1, SET 11, BEN 5, AHF 4, RCO 2** and **RCO 4**.

In order to encourage re-utilisation of some vacant properties, some policy restrictions on village cores may need to be more flexible especially in areas which are indicated to have lower architectural, historical, cultural or streetscape importance. To this effect, the

interventions must also be guided by Structure Plan policies **TOU 9, UCO 5, UCO 6, UCO 9, UCO 10, UCO 12** and **UCO 13**. Retaining the vitality of village cores is very important and therefore certain unnecessary planning policy constraints in village cores may need to be relaxed. Various housing options may also need to be explored. Joining two small properties in a design for a larger one is an option. Controlled and limited additions within the backyard (provided this does not lie on a ridge line or other scenically or scientifically sensitive areas) is another option. Development also needs to be integrated with other planning issues. For example, improvement to the public transport network may reduce pressure on car usage. Reduced vehicular movements may encourage people to inhabit areas where traffic congestion and parking are currently problematic.

Apart from planning policies, there are many other measures which need to be implemented in order to encourage the release of existing properties onto the market. Fiscal schemes which are primarily aimed to encourage the use of existing vacant dwellings, are direly needed. On a lower priority level, there should be measures to encourage the development of vacant land within existing development schemes. A practically non-existent rental market needs to be revamped through changes to existing legislation. Similarly, there should be legislative changes to resolve stalemate situations occurring when a property is co-owned by a large number of individuals.

Although the average dwelling size in Gozo is relatively large when compared to the rest of mainland Malta, given the efforts to promote Gozo as an upmarket destination and given the existing physical oversupply situation, it is not recommended that planning policy directs towards a smaller unit size. On the other hand, larger units are not recommended for entirely different reasons. Larger units are inherently more expensive and therefore less widely appealing to the general residential market. Additionally, larger units are more difficult to maintain and given the ageing population of Gozo, such dwellings may be less appealing at later stages of life. Access within the dwelling and access from the dwelling to surrounding areas needs to be given special attention. The needs of small children, of parents with small children, of elderly persons and of people with special needs have to be taken into account especially at the design stages of new residential dwellings and modifications to existing dwellings. Longer term modifications such as the separation of a relatively large dwelling into smaller units also needs to be taken into account.

#### 5.4.3 Objectives and Strategy

It is important for a good land-use plan to ensure that within the time-frame of the emerging plan, there is an adequate supply of housing. Research indicates that in Gozo, there is adequate supply for housing for the local plan time horizon and beyond. Requests for land to be included for consideration in the Local Plan for Gozo and Comino amounted to around 3.8 km.<sup>2</sup>. This<sup>33</sup> is equivalent to an area one and a half times the area of Comino. This area would accommodate at least 44,700 persons which translates into more than two and a half times the whole population of Gozo and Comino as projected for the year 2010. Therefore, requests to

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<sup>33</sup> The term “This” refers only to the additional area requested for consideration and not the existing and projected area where development has, or is envisaged to take place.

extend the extant development schemes is not deemed justifiable. Housing provision in Gozo therefore be contained within the areas currently earmarked for residential development.

The housing related policies should be aimed to:

- Give top priority to encourage utilisation for residential purposes of the existing under-utilised (or vacant) housing stock.
- On a lower priority, to develop the existing vacant land within development schemes for residential development.
- Minimise wastage of land through the better design of residential units whilst safeguarding against site over-development.

An area which merits attention in residential areas is the qualitative improvement to overall quality of housing. This may be achieved in a number of ways such as:

- Maintenance of front and back facades and any curtilage walls especially where stonework, ironwork or timber is deteriorating;
- Better integration of facades with the architecture of the existing streetscape;
- Respect in the design for adjacent high quality architectural grammar;
- Use of well designed apertures which are preferably recessed from the facade;
- Inclusion of tasteful articulation of facade details;
- Use of un-rendered and un-painted franka stone especially on those dwellings lying in scenically sensitive areas and the edge of ridges;
- Reduction of clutter on the roofs and on facades;
- Screening of plant or apparatus employed for domestic use;
- Use of green elements on the facades (eg. flower pots) may also be encouraged in certain areas especially as a means of improving upon an existing facade.

The strategy towards achieving a high quality, well designed and well utilised housing stock should be prioritised. Maximum priority should be given to the encouragement of the utilisation of the existing under-utilised housing stock. Planning tools would not achieve this on their own. It is also important to couple legislative, financial and educational measures to this effect. On a lower priority scale, vacant land within development schemes should be gradually occupied. It is not envisaged that there will be an increased demand for residential development. However, due to land being at a premium and the envisaged number of persons per dwelling expected to go down, more spatially efficient residential units are recommended.

## 6. TRANSPORT

### 6.1 General Situation

#### 6.1.1 Transport to Gozo

The island of Gozo is separated from the island of Malta by a narrow body of water, and at their closest points the islands are 4.1 km apart. Inter-island transport is mainly provided through a passenger and car-ferry service which operates frequently between *Cirkewwa* and *Mgarr*, as well as a commercial vehicle transport ferry which operates once daily from *Sa Maison*. Between April and December, a high-speed catamaran (the Victoria Express) accommodating 260 passengers, provides three crossings daily between Sa Maison, Sliema and Mgarr. Passenger services are also available via the helicopter air-link from Malta International Airport (MIA) at *Gudja*. Most of the transfer of goods takes place via Malta, although a number of ships do load directly at *Mgarr* Harbour.

In the last 10 years, use of the Cirkewwa – Mgarr service has increased greatly, with currently nearly 3 million passengers and 665,000 vehicles per annum being carried by Gozo Channel Ltd. The phased introduction of new, higher capacity ferries and the modernisation and improvement of port infrastructure is likely to facilitate a further growth in inter-island traffic.

The pattern of movements is very seasonal, with the number of vehicles carried in August (the busiest month) being well over twice the number carried in February (the quietest month).

The number of passengers using scheduled trips on the Malta Air Charter helicopter service has risen from 37,700 in 1993 to some 51,000<sup>34</sup> in 1999. In recent years the growth in passengers appears to have slowed down. Again, there is a very marked seasonal pattern of movement, the number of journeys in the summer months being nearly three times the number in the winter months. In September 1999, (the busiest month) 7,506 passengers were carried on 668 scheduled flights<sup>35</sup> giving an average load of 11.2 passengers per flight.

#### 6.1.2 Public Transport (Land Based)

Bus service provision in Gozo is not as good as the mainland, both in terms of frequency and convenience. This partly reflects the difficulties of serving a semi-rural area, however, the organisation of the service also appears to be an important factor. Scheduled and non-scheduled (mainly tourist related) services are provided by the same operators. As the latter are more profitable greater priority is given to them.

Because of the way public transport is organised on Gozo there is no comprehensive or reliable information readily available regarding bus patronage and the level of use of individual services. It is therefore not known if Gozo has suffered a greater or smaller decline in bus

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<sup>34</sup> In March and April 1999 there were no flights for technical reasons. Patronage for these months has been estimated using data from previous years.

<sup>35</sup> Source: MIA 1999 Annual Statistical Review

patronage when compared to Malta. Between 1989 and 1998 scheduled bus ticket sales on the mainland declined by 21%. In the absence of any evidence to the contrary, there is no reason to believe that Gozo has not suffered a similar level of reduction.

A survey of tourists conducted in 1996/97 found that 22% used public transport as their main form of transport, compared to 51% who mainly used a car. On the mainland usage of these modes was almost the reverse. The lower reliance on public transport in Gozo may be a reflection of the type of tourist who visits the island and/or the poorer level of service offered.

At present<sup>36</sup> there are 67 buses and coaches operating on Gozo, however the PTA is prepared to license a further 11 vehicles when they met the required standards. Of these, only 8 vehicles are engaged each day on a rotational basis, for the performance of scheduled services. There are currently 37 mini-buses (both red and white) and some 50 licensed taxis.

As most buses/coaches are engaged in providing tourist excursions, the age and condition of the vehicles periodically used for scheduled services is better than on the mainland.

### 6.1.3 Private Transport

Except for Rabat and its environs, Gozo is relatively thinly populated and fairly rural in character. Consequently, traffic volumes along most roads are comparatively modest.

The pattern of traffic movement does not conform to the norm, with the intensity of movement during the traditional 'peak hours' being far less marked than would otherwise be expected. In fact, in some locations the flows during the late morning are higher than the 'peak hours'. This probably reflects the lack of urbanisation, and the greater importance of leisure and social activity on the island. It would appear that the traffic flows are noticeably higher in the summer and other holiday periods, reflecting the influence of tourism, both domestic and foreign, on travel patterns.

The Household Travel Survey, conducted in 1998, indicates that the number of households without a car is very slightly higher in Gozo than in Malta (15% as opposed to 14%), but the number of households with two or more cars is a little greater (52% compared to 46%). The areas of greatest population, namely *Rabat*, *Nadur* and *Xewkija*, have higher levels of non-car ownership than the average for Gozo.

Across the Maltese islands car ownership levels have increased dramatically in recent years. Between 1985 and 1998 there was a 130% increase in licensed vehicles, producing levels of car ownership in excess of many other countries in the developed world. **TABLE 6.1** shows the number of registered vehicles in Gozo between 1997 and 1999.

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<sup>36</sup> refers to mid-year 2000

**TABLE 6.1****REGISTERED VEHICLES IN GOZO 1997-1999**

<b>CLASS</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>
Agriculture	185	208	237
Commercial	4,402	4,678	4,931
Garage Hire	45	54	68
Mini-buses	17	20	20
Motor cycles	3,205	3,355	3,499
Private Cars Class 1	7,506	7,645	7,657
Private Cars Class 2	898	1,048	1,257
Private Cars Class 3	730	762	815
Private Cars Class 4	1,277	1,335	1,483
Private Cars Class 5	960	1,063	1,192
Private Cars Class 6	342	354	364
Route Buses	60	78	78
Self Drive Cars	463	461	542
Self Drive Motor Cycles	32	39	39
Taxi	50	50	50
<b>TOTAL</b>	<b>20,172</b>	<b>21,150</b>	<b>22,232</b>

Source: Gozo Vehicle Licensing Department

Examination of licensing statistics (1998 data) reveals some interesting facts. The number of private cars in Gozo is 0.37 per head compared to 0.47 per head in Malta, however there are far more motor cycles in Gozo, with 0.11 per head, as opposed to 0.03 on the mainland. If it is assumed that most commercial vehicles are available for personal transport, then vehicle ownership (for these three categories) in Gozo and Malta are 0.63 and 0.62 per head respectively.

It is not clear if this much greater use of motorcycles in Gozo is mainly due to socio-economic factors, or whether it is influenced by the shorter journey distances and more amenable traffic conditions that prevail in Gozo. Measures to sustain and promote the use of two wheeled vehicles (both motorised and un-motorised) would have beneficial affects in terms of transport, environment and health.

## **6.2 Policy Considerations**

### **6.2.1 Strategic Background**

The Structure Plan highlights the need to co-ordinate land use and transport planning with the object of reducing transport problems by minimising the need to travel. Whilst still important in Gozo, this approach has less relevance because of the absence of major development pressures. Beside this basic requirement, the Structure Plan includes the following additional objectives:

- a) The improvement of roads and the development of a road hierarchy;
- b) The effective management of the road system and the traffic using it;
- c) Improvement of public transport, so as to provide an alternative to the private car;  
and
- d) Improving road safety, through both education and legislation.

Over the last decade, some progress has been made on achieving these aims, particularly legal measures to improve road safety (e.g. drink driving legislation, use of seat belt, and the VRT) and the introduction of some traffic management measures. However, in other areas progress has been disappointing, notably the changes, both organisational and operational, needed to provide attractive and convenient bus services.

### 6.2.2 Structure Plan Policies

A number of Structure Plan Policies are identified as being relevant to the Gozo and Comino Local Plan and these are listed below

Policy **TRA4** outlines the need for constraining parking within Urban Conservation Areas (UCA's) so that only operational vehicles are catered for, with peripheral public parking being provided. Elsewhere, developments will provide spaces in conformity with published standards.

Local Plans are identified as the vehicle for extending pedestrian and access only restrictions in UCA's, shopping areas, and other areas suffering the environmental impact of traffic (**RDS7**; **TEM9**; **UCO14**). A public attitude survey conducted in 1999<sup>37</sup>, indicated significant support for more pedestrianised areas in town centres and village cores.

Policy **RDS1** establishes the need for a road hierarchy and the arterial, distributor and local roads in Gozo.

The Structure Plan advocates the need to develop and improve the arterial and distributor road network (**RDS1**). **RDS4** identifies one major improvement to the arterial network in Gozo, namely the *Rabat* Bypass. This is considered to be a medium priority scheme. Not all of the high priority road schemes set out in the Plan have been constructed and only one of the medium priority projects has come to fruition.

Policy **RDS2** states that land needed for new and improved road links and major junction improvements will be safeguarded, with compensation being paid where land acquisition is necessary and remedial works being undertaken to ameliorate environmental impact (**RDS6**).

There are a number of traffic and environmental management policies relevant to the Local Plan. These include: the treatment of congestion at junctions (**TEM2**); the development of accident remedial measures at problem sites (**TEM6**); introduction of controlled parking schemes (**TEM3**); bus priority measures (**TEM7**); and traffic calming and environmental improvement schemes (**TEM9**).

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<sup>37</sup> The Public Attitude survey was conducted by the Planning Authority in relation to the revision of the Structure Plan.

The Structure Plan identifies a wide range of structural and operational measures that are necessary to improve the quality and extent of public transport provision. These include: rationalisation of ownership and regulation (**PTR1**), purchase of new buses (**PTR2**), improved cleanliness and maintenance (**PTR11**), modern ticketing (**PTR6**), and better waiting facilities and information (**PTR9**). All these are necessary to allow public transport to properly serve those people who are dependent on it, and to provide an attractive, environmentally friendly alternative to the unrestrained use of the private car. The success of many of the other transport policies depends on complementary measures to improve the standard of bus and mini-bus services.

Inter-island transport is of particular importance to Gozo, as it provides essential economic and social links with the mainland. The Structure Plan policies in this area mainly relate to improving sea transport facilities and connections to and across the mainland, particularly to and from the Inner Harbour area. Policy **AVN4** establishes the need for a study of a possible domestic air service between Malta and Gozo by light, fixed wing aircraft and the environmental impact of associated terminal facilities in Gozo.

### 6.2.3 Commuted Parking Payment Scheme

The Commuted Parking Payments Scheme (CPPS), which was adopted by the Planning Authority in 1994, currently applies to various parts of mainland Malta. Under the scheme a payment is accepted in lieu of providing the required parking for a development, where it is either physically impossible or environmentally undesirable to comply with Structure Plan standards. *Rabat* is an area where the possibility of introducing the CPPS is currently<sup>38</sup> being studied.

### 6.2.4 Traffic Calming Guidelines

Traffic Calming guidelines were also adopted by the Planning Authority in 1995 to provide detailed advice on the measures that can be used to reduce the speed of traffic and improve road safety in areas where such problems exist.

## 6.3 Issues Relevant to Local Plan Area (Transport in Gozo)

### 6.3.1 Introduction

Before examining the intended aims and objectives of the Plan, in the context of the broad strategy for the island, it is worthwhile stating the main issues/problems which exist:

- Traffic circulation and access difficulties at peak times of the year, particularly in the centre of *Rabat* and in *Marsalforn*.
- The need, or otherwise, for the construction of a road to bypass *Rabat*
- Shortage of convenient parking, particularly for shoppers and tourists in *Rabat*, and at peak times in *Xlendi*, *Marsalforn*, and *Mgarr*.
- Environmental problems associated with the parking and late night movement of patrons of entertainment establishments along the *Xlendi Road*.
- Poor public transport.

<sup>38</sup> The term “currently” refers to the year 2000.

- The need to encourage more sustainable forms of travel
- Difficulties with inter-island travel, particularly during poor weather and delays arising at times of peak demand.

Outlined below are a number of particular issues which are pertinent to the Gozo Local Plan, which will be used to formulate policies. Many of these have resulted from discussions with local councils, politicians, interest groups and within the Directorate. It is by no means exhaustive and further issues may arise during Local Plan preparation.

### 6.3.2 **Traffic in Rabat**

The most extensive transport issue in the local plan is the need to improve traffic conditions in *Rabat*, particularly providing sufficient parking, establishing suitable routes for through traffic and improving the environment at key localities. Available information indicates that volumes of through traffic are normally relatively modest, as *Rabat* is the focus for considerable activity. Therefore the problem appears to be mainly one of motorists using unsuitable or environmentally sensitive streets when seeking a parking space, or leaving *Rabat*.

Inadequate, uncontrolled, and poorly signed parking is a problem in itself, and also a contributory cause of traffic congestion, because motorists circulate unnecessarily and park in inappropriate locations. The extent of the shortfall in parking will be established when use and demand surveys undertaken at the busiest times of the year have been analysed. Part of the parking problem is envisaged to be addressed through underground parking facilities in the Gozo Communal Centre Project.

The cost and environmental impact of constructing a new bypass around the northern perimeter of *Rabat* would be great, and such a road on its own would not necessarily resolve many of the problems that exist. It appears that the most appropriate strategy for *Rabat* will include: the construction of some new road links to provide convenient relief routes; traffic management measures to relieve congestion at the most critical locations; parking controls; and environmental improvements.

### 6.3.3 **Marsalforn**

During the summer months there is localised congestion in *Marsalforn*, probably due to the lack of traffic management and control measures. A relatively large car park exists at this popular resort, whilst the nearby parking area near the *Qbajjar* promenade takes some of the load. These parking areas are reported to be inadequate at the busiest times. Furthermore, there are indications that people seek to be close to the sea-front, competing for limited parking spaces. Considerable on-street parking also takes place at this resort area.

### 6.3.4 **Xlendi / Fontana**

During the busier times of the year (especially in summer), there are major parking problems at *Xlendi*. The entertainment facilities on the link road between *Xlendi* and Fontana exacerbate the problem. Clearly *Xlendi* and its environs has been developed to an extent, which when fully utilised, cannot be adequately catered for by the existing transport network.

The very popular night time entertainment venues situated just outside *Xlendi* are dependent on on-street parking. The number of patrons that these facilities attract is totally disproportionate to the limited parking that exists, and consequently, congestion and related problems arise. To make matters worse, motorists returning from these venues in the early hours of the morning cause particular annoyance to residents in some parts of *Fontana*. Apart from being reportedly rowdy at an inappropriate time, the flow of cars is forced to pass through the narrow streets of *Fontana* uphill, thus generating noise and pollution. The *Fontana* local council is seeking to identify alternative routes, however, this may have the effect of just moving the problem to another locality. The *Munxar* local council is objecting to any traffic re-direction which would adversely effect the settlement of *Munxar* (eg. to direct the outgoing flow through *Xlendi* and then using the country road which links to *Rabat* through *Munxar*.)

## 6.4 Issues Relevant to Local Plan Area (Inter-Island Transport )

### 6.4.1 Introduction

Currently, the most important mode of transport between the two main islands (Malta and Gozo) is the ferry service. Three million passengers and thousands of cars are ferried between the islands each year in addition to thousands of tonnes of cargo. Unquestionably, the ferry service is the life-line of Gozo. The importance of this service is particularly evident during the few instances each year when the ferry service is suspended due to bad weather. Hundreds of employees who commute daily to Malta for work or to study are stranded in Gozo, and commercial activities are adversely affected. Tourists are either stranded in Gozo, or are not able to visit Gozo until the ferry service is re-established. Thus the importance of having harbour facilities which allow ferry operations under all-weather conditions cannot be over-emphasised. The sea is also the mode of travel for hundreds of marine craft which operate either for recreational purposes (including diving) or for fishing.

Since the early 1990's, thousands of passengers have travelled to Gozo via the helicopter service which operates between the *Xewkija* Heliport and Malta International Airport. The air link is also important during spells of bad weather when the helicopter is used as an alternative to the ferry in order to maintain a limited measure of communication between the two main islands of the Maltese archipelago.

The possibility of having a fixed link between Malta and Gozo has been suggested on a number of occasions since the late 1960's, but to date this idea has been considered impractical and uneconomic.

### 6.4.2 Sea Transport

The vast majority of tourists which visit Gozo and practically all the goods that enter or leave the island, pass through *Mgarr* Harbour. Equally important, the ferries constitute the main means of commuting for the Gozitans and Maltese to and from Gozo. Currently, a one way car trip from *Rabat* in Gozo to *Valletta* via the ferries takes around 80 minutes under optimum conditions. In practice, this can take substantially longer, given the time spent purchasing a ticket, queuing, waiting for passengers to board the ferry, waiting for passengers to leave the ferry, disembarkation, and so forth. The average *Rabat* to *Valletta* trip is estimated to take slightly

more than two hours. Thus a *Rabat* resident working in *Valletta*, who opts to use the *Cirkewwa* ferry to commute to Malta will spend more than four hours per day travelling to and from work. A person who uses the catamaran will take about an hour each way, but such trips are much less frequent than the ferry ships, and involves travelling to and from *Sa Maison*. The high-speed ferry is also seriously hampered by even moderately unsettled weather.

Proposals to upgrade the *Cirkewwa* and *Mgarr* harbour facilities, introduce more modern ships, and segregate passengers and cars should improve turnaround times on the main ferry services. The proposal to build an all weather harbour at *Cirkewwa* should also safeguard contact between the two islands during unsettled weather.

Currently, the large parking area serving the port at *Mgarr* not only accommodates vehicles waiting to board the ferry and the cars of Gozitans using the ferry, but also casual visitors to the area. At peak times there are insufficient spaces to cater for all these demands, consequently congestion arises. The proposed construction of a terminal building at the port will reduce the parking area, thereby exacerbating this problem.

Concern has been expressed by the *Ghajnsielem* local council about the disruption caused by the volume of traffic using the main *Mgarr-Rabat* road through *Ghajnsielem*. Whilst most of the town lies to the north of this road, it is the focus of some retail and commercial activity, attracting on-street parking and pedestrian crossing movements. The council has suggested that a bypass on the southern side of the settlement should be considered.

The total number of passengers carried by the Gozo ferry service has been experiencing an almost steady increase as indicated through **TABLE 6.2** The average annual total passenger increase is around 62,000 total passengers (based on period between 1995-1999). If it is assumed that this rate is maintained till the end of the local plan horizon, then in 2010 one can expect almost 3.6 million passengers crossing on an annual basis. This assumption has to be treated with caution though for the following reasons. The population of the Maltese Islands is not increasing at such a high rate, the number of holidays (during which large numbers cross-over to Gozo) is unlikely to increase and any major increase in numbers would detract from the Gozo experience which is based on the “get away from it all” concept. Additionally, the number of tourists visiting the islands may be limited by the available accommodation and by overseas competition.

Total vehicles ferried between the islands are also registering an increase, however there was a marked decrease in the years 1997 and 1998. However, in 1999, the number of vehicles ferried exceeded the 1995 figures. The increase in vehicles ferried is of concern, especially if the vehicles arrive in bulk rather than being spread out over the day or over the year. It is important to note that there is only one link from *Mgarr Harbour* to the rest of Gozo and the carrying capacity of this carriageway is rather limited.

**TABLE 6.2**

<b>SEA FERRY CROSSINGS 1995-1999</b>						
	<b>1995</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>	<b>TOTAL</b>
<b>DESCRIPTION</b>						
Total Passengers	2,707,015	2,756,689	2,730,874	2,850,794	2,957,303	14,002,675
Total Vehicles	602,916	638,682	563,367	602,144	666,046	3,073,155
Total Gozitans	260,212	273,891	243,789	249,673	290,479	1,318,044
Total Vehicles (Gozitans)	103,364	111,059	102,390	106,256	129,354	552,423

Source: Gozo Channel

### 6.4.3 Air Transport

The idea to have an air-link with mainland Malta goes back at least twenty-five years. In 1990, a helicopter link was started on an experimental basis between *Xewkija* and *Luqa*. This service has gradually been upgraded until now there is a small heliport at *Ta' Lambert* in *Xewkija*, and the helicopter service operate 8 – 12 journeys in each direction during summer. The main advantage of the air link is essentially one of time saving. This advantage has to be weighed against a low frequency, irregular timetable, the cost, and the inflexibility of not having a car readily available at one, or both ends of the journey. Therefore, the airlink is most useful to passengers using the Malta International Airport. The following represent the main types of users of the air service between Malta and Gozo.

- Tourists seeking a special experience when travelling to and from Gozo
- Maltese businessmen or officials who opt for the airlink in preference to the ferry
- Overseas tourists who wish to transfer directly to Gozo from the airport.
- Returning Gozitan migrants.
- Gozitans who commute to the Malta International Airport.

The foregoing do not indicate those users who opt to use the helicopter on sightseeing excursions or during rare instances when the ferry service is suspended due to bad weather. **TABLE 6.3** indicates that the total number of passengers has shown a slight trend towards decrease in 1999.

**TABLE 6.3** below gives the number of passengers using the service in recent years.

**TABLE 6.3****MALTA AIR CHARTER HELICOPTER PASSENGERS**

<b>SERVICE</b>	<b>1993</b>	<b>1994</b>	<b>1995</b>	<b>1996</b>	<b>1997</b>	<b>1998</b>	<b>1999</b>
<b>Gozo Shuttle</b>	37,729	55,652	54,513	43,677	47,925	49,727	47,639
<b>Excursions</b>	7,058	11,925	9,813	11,059	7,508	6,771	4,574
<b>Total Passengers</b>	<b>44,787</b>	<b>67,577</b>	<b>64,326</b>	<b>54,736</b>	<b>55,433</b>	<b>56,498</b>	<b>52,213</b>

Source: Malta Air Charter

In 1999 the service only operated for 10 months for technical reasons. It is estimated that in a full year patronage would have been about 51,000, excluding excursion passengers. It appears that in the last few years, passenger growth has been slowing, and patronage has not again reached the levels established in 1994 and 1995.

It will seem that in addition to the scheduled service, the helicopters are also used for sight seeing excursions. The number of such tourists has generally declined since 1996.

Various suggestions have been made to extend the current helipad by “a few hundred metres” to provide a runway for fixed wing aircraft. Indications are that in order to operate a 30 seater aircraft, an 800 m. runway would be required with 300 m. at each end retained free from obstruction.<sup>39</sup> If this assumption were to be adopted, an extension to the existing runway cannot be undertaken because the proposed runway would over-run an existing built up area at *Ta' Gorgjun*, due East of Xewkija. The distance between the existing terminal building and the *Gorgjun* built-up-area is less than 800 m.

Environmentalists are actively objecting to the proposal of constructing an airstrip in Gozo. Their justification is based on the grounds that hectares of countryside would be developed<sup>40</sup>, that the service would only be enjoyed by a privileged few, and that no studies have been conducted on economic feasibility, including the capital cost of the airport extensions and ancillary facilities, expropriation of land, and the demand for such a service.

It is important to note that from a planning point of view there a number of considerations that have to be taken into account. A significant part of the land in question is attracting interest from a number of other potential users. Some are interested in clearing the considerable mounds of rubble to create a recreational area, others wish to convert the area into a waste transfer station because of its locational advantages, whilst others are interested in creating a site for SME's. All these opportunities have to be taken into account when formulating the local plan, together with their environmental impacts.

<sup>39</sup> Indications on probable dimensions of the airstrip emerged from a meeting between the GCLP and MIA on 16<sup>th</sup>. Feb 2000.

<sup>40</sup> Nature Trust against Gozo Airstrip proposal, the Times, Feb 2, 2000. Also against AD and ECO (Times 4/02/2000)

#### 6.4.4 Direct Link

The idea of having a bridge between the two main islands has been around for scores of years<sup>41</sup>. Whilst some consideration may have been given to such a possibility, real proposals have never materialised. In the meantime, the ferry service has greatly improved, the air service has been introduced and civil engineering costs have increased, reducing the attractiveness and consequent likelihood of such a project.

The public attitude survey<sup>42</sup> conducted by the Planning Authority indicates that on a national level, 57% were in favour of the bridge, 36% were against and the rest either did not answer or had no opinion. However, when analysis is conducted by the Gozo local plan area, it transpired that more than 60% were against the idea of a bridge. Meetings with Gozitans indicate various points of view. Some argue that the introduction of a bridge (or a tunnel) will take away the separate identity of Gozo, and greatly detract from the island's attraction and exclusivity. Additionally, they argue that easier access between the islands will have negative economic effects, as Gozo becomes more developed, less attractive, less exclusive and less likely to attract overnight stays. At present the limited vehicular capacity of the ferries (compared to a bridge) acts as a throttle, restricting the amount of traffic that can enter Gozo at any particular time. Removal of this restraint would have far reaching socio-economic and environmental affects. Others argue that a bridge between the islands would enhance commerce between the islands, would guarantee all weather crossings, and reduce crossing times.

There are various points to consider. The question of shortening of time, for example, is a valid one. With the current waiting times to board the ferry, a bridge is estimated to reduce average travelling time to Valletta from nearly two hours to around one hour fifteen minutes. With reduction to waiting times and improvements in schedules, the difference can be decreased. The current catamaran trip to Valletta takes around 45 minutes under good weather conditions. If a good public transport link is established between the catamaran landing place and various areas in and around Valletta, this could represent a very good solution.

It must be also borne in mind that whatever fixed link option is considered, the civil engineering and maintenance programmes would be very expensive and some kind of toll system would need to be introduced in order to recoup the initial capital outlay and maintenance costs. There is also a perception amongst sectors of the Gozitan community that the bridge crossing would be free of charge and would be as easy as commuting on Gozo through public roads. Another very important consideration is the effect on the other inter-island service providers (mainly the sea ferry and the helicopter link). The economic repercussions on these operations would definitely be negative with the consequent impacts on the capital and maintenance outlays on these services and the associated employment. There are also very negative environmental considerations, especially if the bridge option is resorted to. A suspended bridge option would entail considerable excavations to anchor the foundations, a new road network to link to the existing road network in Gozo and would be visually very conspicuous once finished. If a tunnel is resorted to, huge amounts of material have to be excavated and somehow disposed of and part of this excavation must take place on land in order to link with the underwater infrastructure.

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<sup>41</sup> Ms. P. Vella, indicated a report compiled by Japanese consultants commissioned by the Government of Malta to explore the possibility of a landlink between Malta and Gozo.

<sup>42</sup> Public Attitudes Survey, Final Draft Volume 1, September 2000 by PA

Considerable investment needs to be undertaken to ventilate the tunnels, to power it (mostly lighting) and to provide for countless safety features. Underwater suspended tunnels have similar infrastructural requirements although are less intensive in terms of underwater excavation. Given the foregoing, the direct connection option does not seem to be practical or appropriate at the present point in time.

Finally, and very significantly, a bridge would have a dramatic impact on visual amenity. Its size and presence would dominate the north west of the mainland and eastern Gozo and over shadow Comino. Whilst a well-designed bridge can be impressive, it inevitable changes the whole nature of the surrounding land / seascape. Additionally, the new road connections and supporting road improvements, and the need for a toll plaza (presumably on the mainland) would have adverse environmental impacts.

At present there is no convincing case in favour of a fixed link, in fact there are many strong arguments against it. Any proposal for a bridge (or tunnel) should not only consider its economic viability, but take account of the major socio-economic and environmental implications in both Gozo and north west Malta.

#### 6.4.5 Comino

Access to the island of Comino is mainly via a small boat ferry service which operates chiefly to the Comino Hotel. A great proportion of visitors to Comino arrive on private marine craft, some of which are part of sightseeing tours. Most of marine traffic occurs in the warmer months, with a peak between June and September.

There are limited facilities for vehicular traffic on Comino, circulation being mainly restricted to the dirt tracks which criss-cross the island. These are sufficient to accommodate the handful of vehicles that exist. It is not envisaged that any major upgrading should be undertaken to these tracks, apart from consolidation (but not widening). This will safeguard, the exclusive, unspoilt atmosphere of isolation and remoteness that the island presently enjoys. Improvements need to be undertaken to some footpaths to improve facilities for pedestrians, especially those walking between *Bejn il-Kmiemen* and the Comino Hotel. Generally walking should be restricted to carefully selected routes, rather than encouraging visitors to wander over the whole island.

## 6.5 Policy Approach

### 6.5.1 General

Transport of people and goods to/from Gozo and within Gozo itself is essential to the continued and improved functioning of the Gozitan Society. It is therefore essential to ensure that the intra-island and inter-island services continue to support the island with the transfer of goods and people. Gozo is heavily dependent on the port for communication with mainland Malta and the rest of the world. The air service complements the ferries. On Gozo all vehicular traffic takes place on the road network ...there are no trains or trams.

### 6.5.2 Outline Scenarios

Upon examining the current situation as well as the projected situation, it is envisaged that requirements for travel in all modes is expected to increase. In general, it is therefore presumed that facilities needed to support transport merit improvements in order to be able to accommodate the increases in load.

However, it can be envisaged that no improvements are undertaken in spite of increases in load. For example, if private car ownership increases and the road network is not upgraded accordingly, then congestion is likely to occur. Shifts in mode may help ... for example an improved public transport system may encourage more people to use it, hence less reliance on cars and therefore less congestion and parking problems. Better traffic management may also help ... for example through the introduction of traffic signalling devices, re-directioning of circulation, traffic time-management and other such measures. In the case of Gozo, all modes of transport experience a seasonal shift in load, with the greatest impact being experienced during weekends coinciding near a public holiday and during the summer months.

In the case of parking, the problem is chronic in *Rabat* and intermittent at *Mgarr* harbour and the seaside resorts. Provision of additional parking facilities is envisaged to solve some of the problems in the short run, but if use of the private vehicle continues unchecked, provision may be outstripped by demand. Therefore, unless measures are taken to discourage private car use and encourage public transport, the land transport situation in Gozo may not improve.

As far as transport by sea is concerned, the harbour has definitely become too overcrowded. Possibilities for either alternative utilisation of the harbour at *Mgarr*, the use of alternative sites for certain types of maritime activities and/or possibilities for expanding the harbour at *Mgarr*, are all options which need to be considered. Environmental Impact Assessments (EIA's) and economic feasibility studies also need to be taken into account when considering the various options and scenarios. These studies would also need to be undertaken when the issue of inter-island air transport is being considered.

### 6.5.3 Objectives and Strategy

The main aim of transport planning is to promote a balanced approach to transport, by creating more efficient transport services, by effectively managing resources and by taking greater account of the environment and the needs of vulnerable road users. To reduce level of congestion and actively provide suitable alternatives to the private car where feasible. The policy strategy should therefore address the following main transport related goals:

- Minimisation of distance between the main residential and employment/education centres within Gozo
- Creating as many employment/education opportunities as possible in Gozo so that travelling to Malta for employment/education purposes is minimised.
- Creating opportunities which would minimise dependence on private transport and maximise the utilisation of public transport.
- Prioritising in favour of non-land intensive measures to alleviate traffic circulation and parking problems as opposed to solutions which consume considerable tracts of precious land.

- Improvement of circulation between the Gozo' Harbour and the main residential centres with special emphasis on the *Rabat - Mgarr* Link.
- Improvement of facilities at *Mgarr* and *Cirkewwa* to render sea commuting between the two Islands more enjoyable and smoother in operation as well as to ensure continuation of service during episodes of bad weather.
- Exploration of possibilities to improve upon the existing air-link with special emphasis on solutions which minimise land take and ensuring that the economic viability of the options considered would be based on sound, tangible and justifiable premises.

In order to attain these goals, instruments other than planning policies must be resorted to and integrated in order to achieve a more efficient transportation system. The current mentality that additional provision of new roads, parking spaces and other transport related infrastructure in Gozo will solve the vehicular circulation problems in Gozo is unfounded. Experience in other countries shows that no matter how much provision of roads and parking spaces are provided, if the use of the private car is left unchecked and unmanaged, problems of congestion, pollution, noise, fuel wastage, safety and unpleasant environment will all continue to emerge. Planning, legal, fiscal and educational tools should all be employed to encourage people to use their private car less frequently and more intelligently.

It is known for example that people use their car to commute for distances as small as 100m. Unless transferring considerable loads or carrying persons with special needs or operating in bad weather, such practices should be strongly discouraged. Commuting to work is another area that requires attention. Given that most people work or receive education in *Rabat* and that most people start operations at around the same time in the morning and leave at around the same time in the evening, possibilities for organised transport should be explored. Use of unobtrusive shading structures along the more exposed and highly frequented pedestrian routes may encourage more people to walk in sunny weather or in light rain. Public transport in Gozo definitely needs some major rethinking as the current service is practically all but non-existent.

Gozo is fortunate that the extent of transport problems is not as great as some parts of the mainland. Nevertheless, during busy periods of the year real problems exist in some locations that require solutions. The character of the island results in greater reliance on the use of the private car, yet if its environmental quality is to be retained the use of cars needs to be controlled, and where feasible, alternative, more sustainable forms of transport need to be promoted. This is particularly important in areas of historic and/or scenic value. Greater attention needs to be paid to the requirement of pedestrians, disabled people and cyclists.

To achieve this strategy, a number of key objectives need to be pursued in the local plan. These are outlined below,

- Seasonal traffic congestion in the centre of *Rabat* and locally in *Marsalforn* and *Mgarr Harbour*, are problems that require resolution. In accordance with Structure Plan policies **RDS 4** and **TEM 2** and **TEM 9**, the Local Plan will aim to introduce traffic management measures, junction improvements and, where necessary, new road links to improve the movement of traffic in these areas and to enhance safety and amenity in important and sensitive locations. Consequently the local plan will promote measures to

improve the movement of traffic in and around *Rabat* and *Marsalforn*, and enhance environmental conditions at key locations.

- Parking is a problem in a number of areas, particularly the centre of *Rabat*, *Mgarr* (port), *Xlendi* and *Marsalforn*. In some cases it is a matter of inadequate supply at peak times, in others it is the absence of control. In accordance with Structure Plan policy **TEM 3**, the local plan will promote parking measures to properly designate and control on-street and off-street so as to effectively use the available stock, and where necessary identify additional parking.
- The provision of an attractive, convenient and efficient bus service is more difficult in Gozo than mainland Malta, because of lower population densities and the pattern of settlements. Despite this, improvements are very necessary if public transport is to play its important part in solving the island's transport problems. Innovative and flexible changes to the organisation and operation of services will be necessary to serve the needs of residents and tourists. The possibility of introducing community transport schemes should also be explored.
- Environmental problems exist in a number of locations caused by the noise, severance and danger produced by passing traffic. Solutions will involve the use of traffic calming features, accident remedial measures, and in extreme circumstances the construction of suitable alternative routes.
- In recent years inter-island has improved and Gozo Channel and Malta Maritime Authority have plans to expand ferry services and provide better terminal facilities at both *Mgarr* and *Cirkewwa*. The Harbour at *Mgarr* is already congested and possible future expansion merits serious consideration. A study of the possibility of replacing the helicopter service with a fixed wing service is required, to establish its economic viability and environmental impact. The possibility of utilising amphibious aircraft should also be considered as stipulated by SP policy **AVN 4**.
- In certain parts of the island and for some journeys, walking and cycling are feasible, realistic alternatives to car use. This would reduce the pressure for parking and improve environmental conditions. Such modes are not currently common or popular and therefore they would need to be actively promoted, with supporting facilities being provided. Many journeys in Gozo are relatively short, providing a realistic opportunity to increase the use of sustainable means of transport. The use of motorcycles is relatively high and measures to increase this mode of transport should be encouraged.
- Land-use policies which minimise the need to travel, which shorten journey distances, and which encourage sustainable means of transport will be encouraged. Equally, developments which increase employment and educational opportunities, and consequently reduce the need to travel to the mainland will be beneficial.

## 7. SOCIAL AND COMMUNITY FACILITIES

### 7.1 Introduction

The well being of any residential community is highly dependent on the nature, extent, type and location of the nearby social and community facilities. A residential settlement without provision for educational, health related, elderly related and recreational facilities cannot be considered as being a well-developed settlement. The life of the community needs to be provided with facilities that encourage the interaction of human beings through formal and informal socialisation. Social and community facilities also need to take into account the material, religious, cultural and social aspirations of the respective community. For example, it is pointless to provide for say rugby facilities in a community if the members of the community do not practice the sport and show no inclination to do so.

The size, location and design of social and community facilities within the built framework is also very important. For example, if an association needs to accommodate two hundred persons in social events, provision to accommodate ten persons would clearly be insufficient. Similarly, to locate a building intended for frequent use by the elderly at the top of a steep incline and with no vehicular access would be similarly counterproductive. It is also essential to cater for facilities utilising open spaces. Apart from creating urban focal points to complement the local architecture and streetscapes, open spaces are essential to serve as external meeting places and places of assembly and also provide an opportunity to provide some hard or soft landscaping features which creates additional interest and character to an area. Internal and external social and community facilities have to be easily accessible, strategically located, and adaptable. Some of them need to cater for people of all ages and with a varying range of abilities.

### 7.2 Policy Background

The main planning policy guidance concerning social and community facilities can be found in the Structure Plan for the Maltese Islands in section 9. Most of the policies are equally applicable to Malta and Gozo. In policy **SOC 3**, land and buildings adjacent to existing or proposed health centres will be safeguarded in Local Plans and utilised for the expansion of medical facilities or other community uses. In the Gozo, this policy has not been necessarily implemented in the case of each health centre but there is a significant expanse of land around the Gozo General Hospital to cater for appreciable future expansion. Policy **SOC 13** indicates that the Planning Authority, mainly through the Local Plans, will co-operate with the Ministry of Education in implementing policies aimed at seeking the optimal use of existing education sites and buildings in relation to forecast demographic trends, and in realising higher standards of provision on new sites of classroom and specialist uses, playing fields, and servicing/parking. In the case of Gozo, this is mainly being implemented through the communication undertaken through the formulation of the Gozo and Comino Local Plan.

Policy **SOC 14** states that the Planning Authority, in conjunction with the Ministry of Education, will seek to ensure the adoption of standards of provision and operational procedures which will allow to the fullest practicable extent for the joint use of school facilities for the

provision of community services such as clubs, cultural and leisure activities, social services, and sport. In the case of Gozo, the Ministry for Gozo already operates a good system whereby a good number of extracurricular activities are undertaken in the schools of the respective locality. Additionally, a number of local council offices are located within the primary school premises of the respective locality. The identification of new buildings and sites suitable for conversion to accommodate day centres, sheltered homes and other facilities has been highlighted in policy **SOC 18**. In fact this policy encourages liaison between the Planning Authority and the Secretariat for the elderly to this effect. Meeting with various agencies have indicated potential sites for such facilities but there are difficulties with long term plans to this effect.

Policy **SOC 22** guides to the provision of facilities to support the full range of cultural activities, as part of existing and new schools (**Policy SOC 14**), new and upgraded district libraries, or in purpose built units. Whilst it is desirable to have such facilities in every locality, economies of scale dictate that most such facilities are only provided in the larger settlements. This situation is not expected to substantially change although there ample scope for improvement of the existing facilities in terms of the service that is being provided.

Policy **SOC 23** states that both the public and private sectors will be encouraged to provide community facilities, transport, and retail services in exiting housing areas which lack such services and facilities. In Gozo, the provision of retail facilities is quite good and fairly accessible, in some cases accessibility is even better than parts of mainland Malta where more specialised retail is more scattered whereas in Gozo, the more specialised retail can be practically all found within walking distance in *Rabat*. Transport however remains a problem especially in *Rabat* where the older street network renders circulation and parking rather difficult especially in certain seasons and times of the day.

Policy **COM 7** states that Local Plans for areas containing existing shopping centres will be required to particularly include ways in which these centres can be made more efficient and pleasant by instituting rehabilitation programmes (including shop fronts and advertisements), traffic calming and pedestrianisation, rationalised service delivery and customer parking provision, access for the disabled, and townscape design. In certain aspects, this policy has partially been realised through compliance with the policy guidance on shop fronts, policy guidance on adverts, policy guidance on kiosks and the UCA policy design guidance. The Local Plan should consolidate the direction initialised through this guidance with more comprehensive and more site-specific policy direction.

## 7.3 Education

### 7.3.1 Background

The education sector in Gozo is not very different from that provided on mainland Malta and is, in general terms, based on similar lines. The level of education is also similar. The main difference arises at the tertiary level whereby Gozitans have to undertake tertiary level education in mainland Malta (or overseas). Although there is a branch of the University of Malta which is known as the University of Gozo, this offers specialised training sessions and courses and is not a fully-fledged University.

As far as primary and secondary education are concerned, Gozo is well catered for in terms of number of schools and practically each main settlement has its own school. The schools have low to medium occupancy density and the ancillary facilities (eg. playing grounds) are generally good. A number of schools in Gozo also accommodate other services such as Local Council offices or health clinics. The only shortcoming in some Gozo schools is regular maintenance and lack of modern facilities but as far as spatial requirements are concerned, Gozo Schools can be generally considered to be well catered for.

In recent years, there has been a substantial increase in the number of Gozitans studying at the tertiary level and eventually obtaining a degree. A significant proportion read for a degree in Education but there are several other professions. There is a problem with coupling the number of graduates with job opportunities in Gozo. This is resulting in a brain drain for Gozo. If the situation is to be reversed, enough professional jobs have to be created in Gozo with attractive working conditions so that the better brains are retained on the island.

### 7.3.2 Existing infrastructure

Nearly all towns and villages in Gozo have a primary school with several having space in excess of their requirements. Most schools were built in the sixties. School heads normally allow for facilities to be used by the community provided school security is not compromised and users cover any additional costs required. In 1999, 2,105 pupils were registered to attend the primary state schools. (Refer to **TABLE 7.1** & **TABLE 7.2**)

An important government school is the primary school at *Vajringa* Street. Apart from accommodating the largest number of primary level pupils in Gozo, this school lies within the village core and can only be accessed through narrow streets and hence, traffic congestion is sometimes created. At the school opening and closing times, mini vans which collect the youngsters, park in front of the school entrance with the result that *Vajringa Street* becomes temporarily blocked. Space for recreation is also somewhat limited. Part of the building is used as a public reference library.

Secondary education facilities in Gozo are concentrated in the school complex at *Rabat* which includes four schools (two secondary schools, a post-secondary school and a boys' trade school). The complex shares a football pitch and a school hall. Students also make regular use of the adjacent Gozo Sports Complex. A flexible approach is taken in the running of the schools with teachers being shared when required and space being transferred from one school to another according to fluctuations in school population. This allows for the best possible use of available space. Space limitations have prompted an initiative to extend the post-secondary school because of space limitations. The extension also includes additional facilities such as laboratories. The main school complex at *Rabat* has areas for recreation that cater for some 500 students. This complex can therefore be considered as overcrowded and there is restricted room for further expansion or addition of classes. Even if the option to expand vertically is resorted to, this would result in an increased ratio of class space to open recreational area<sup>43</sup>.

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<sup>43</sup> Dr. Ray Scerri, policy co-ordinator in the Ministry of Gozo mentioned to possibility of considering part of the secondary school being relocated to a school which can accommodate more students.

Apart from the secondary schools in *Rabat*, there is a girls' trade school, accommodating 47 students, in *Xaghra*. An agricultural school in *Xewkija* accommodated a further 94 students in 1994.

**TABLE 7.1****PRIMARY STATE SCHOOLS - JULY 1999**

Name of School	Type	Locality	No. of Students
Ghajnsielem	Primary School	Ghajnsielem	191
Gharb	Primary School	Gharb	92
Kercem	Primary School	Kercem	141
Nadur	Primary School	Nadur	312
Qala	Primary School	Qala	102
San Lawrenz	Primary School	San Lawrenz	41
Sannat	Primary School	Sannat	206
Victoria	Primary School	Victoria	406
Xaghra	Primary School	Xaghra	316
Xewkija	Primary School	Xewkija	223
Zebbug	Primary School	Zebbug	75
<b>TOTAL</b>			<b>2,105</b>

Source: Strategic Planning Unit

**TABLE 7.2****NON-STATE SCHOOLS - JULY 1999**

Name of School	Type	Local Council	No. of Students
Laura Vicuna School	Primary Schools	Ghasri	187
St. Theresa School	Kindergartens/ Nursery	Kercem	30
St. Theresa School	Pre-Grade Schools	Kercem	30
St. Theresa School	Primary Schools	Kercem	176
St. Francis School	Kindergartens/ Nursery	Nadur	19
St. Francis School	Pre-Grade Schools	Nadur	19
St. Francis School	Kindergartens/ Nursery	Victoria	24
Konservatorju ta' Hsqof	Kindergartens/ Nursery	Victoria	30
Laura Vicuna School	Pre-Grade Schools	Victoria	64
St. Francis School	Pre-Grade Schools	Victoria	32
Konservatorju ta' Hsqof	Pre-Grade Schools	Victoria	30
St. Francis School	Primary Schools	Victoria	193
Konservatorju ta' Hsqof	Primary Schools	Victoria	44
Seminarju tal-Qalb ta' Gesu'	Secondary Schools	Victoria	275
St. Francis School	Kindergartens/ Nursery	Xaghra	16
St. Francis School	Pre-Grade Schools	Xaghra	16
St. Francis School	Pre-Grade Schools	Zebbug	26
<b>TOTAL</b>			<b>1,116</b>

Source: Strategic Planning Unit: Note, light -shaded areas are presumed to constitute double counting.

Apart from the Gozo University, there are no tertiary education facilities in Gozo. The Gozo University is in fact a small branch of the University of Malta and there are no full time courses. However specialised courses and training sessions are regularly conducted in a small building which lies at *Xewkija* on the main route to *Rabat*. There is however a lack of adequate parking facilities and access to the Gozo University is directly via an arterial route.

### 7.3.3 Issues

At the primary and secondary school level, Gozo could be considered to be well provided for. The exceptions are *Munxar and Ghasri* which lack a primary school in the locality. Parts of the residential part of *Fontana* lie closer to the *Rabat* Primary school at *Vajringa Street* than the more distant parts of *Rabat* and hence the settlement is well catered for by the *Rabat* school. Traffic congestion often occurs at the more populated schools in *Rabat* especially at the starting and finishing times in the morning and the early afternoon. Some of the roads leading to some schools have to be closed till the buses and mini-vans load the students onto the vehicles. However this situation is limited in duration.

The church in Gozo manages a number of pre-grade and primary schools. The only Church or private secondary school in Gozo is the Seminary which is a boys' school. In 1999, there were

a total of 1,116 pupils attending non-state schools in Gozo of which 275 pupils attended the only non-state secondary school at *Rabat*. In the coming years, there may be increased demand for a private girls secondary school and possibly a further boys' school. The other secondary schools is also located in *Rabat*. In the scholastic year 2000-2001, the Gozo Secondary school complex accommodated a total of 2,732 pupils (including the sixth form). Referring to Table 24:1 in the "Proposed Guidelines for the Building of Secondary Schools" it is evident that the current school complex is overcrowded both in terms of site area provision as well as in terms of minimum areas for secondary schools<sup>44</sup>. Therefore, area needs to be reserved to address this situation. Given that an envisaged school population of around 3,100<sup>45</sup> is envisaged by the end of the local plan period, at least a total of 71,300 sq. m. would be required. The existing site covers only 31,120 sq. m. implying that at least 40,180 sq. m. of land would be required to meet the minimum standards by the end of the local plan period.

Multi-use of schools should be encouraged especially in those schools where the student population is relatively limited. Apart from better land-utilisation, the multi-function approach may lead to the school becoming more the focus of some socio-cultural functions within the locality and may help with encouraging further maintenance and upgrading of the school premises. Initiatives toward further embellishment would also be encouraged as more activity takes place. Similarly, social integration across the age groups would be promoted. There may also be scope for parts of under utilised schools to be leased to the private sector to provide a service. Arrangements to finance certain maintenance requirements for the rest of the school may also be considered. The main obstacle with this arrangement is envisaged to be the perceived lack of identity or exclusivity of the private school operator, however, given imagination and will, this problem could be surely overcome.

There is also scope to promote the upgrading of the Gozo University. The existing premises could cater for specialised courses which attract students from mainland Malta or from overseas. More students would also mean that the occupancy rates of the existing tourism related accommodation facilities would also improve. However, there are problems with vehicular access to the site which need to be addressed (see **Section 7.3.2**).

## 7.4 Health

### 7.4.1 Background

In Gozo a good range of medical facilities currently exist. Nearly all of these facilities are located within the Gozo General Hospital in *Victoria* and the adjacent Mental Hospital. A polyclinic, which caters for lesser disorders and injuries, is found in *St. Francis Square* (also in *Rabat*). Local clinic ("Bereg") are also found in many towns and villages of Gozo. A doctor is normally available in these local clinics for half an hour a day to treat minor injuries.

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<sup>44</sup> Refer to pages 128-142 in "Proposed Guidelines for the building of Secondary Schools" compiled by architects Joseph Falzon and Joseph Spiteri, Education Division, Ministry of Education and National Culture, Floriana

<sup>45</sup> In the absence of projections, the following assumptions are being pursued. The 2010 age group population 10-19 is estimated (very roughly) to be c. 3,900. Currently, 64% of the same age group attend secondary education. If we assume that by the end of period, percentage rises to 80%, then provision has to be made for around 3,100 pupils.

#### 7.4.2 Existing Infrastructure

Although, one can find a good range of medical facilities in Gozo, in some cases there is still a need for patients to be transferred to Malta's hospitals. 'Service Efficient Transport' is therefore an issue to be taken into consideration. Examples could include an equipped clinic on the Gozo-Malta ferries.

The Gozo General Hospital offers a variety of services. **TABLE 7.3** lists some of these services:

**TABLE 7.3**

#### HEALTH SERVICES IN THE GOZO GENERAL HOSPITAL

	SERVICE	REMARKS
a.	Maternity	Services related to pregnancy, labour and post-natal care.
b.	Orthopaedics	Care of infant and child related disorders.
c.	Paediatrics	
d.	Geriatrics	
e.	Emergency	Care of elderly persons requiring medical care within a hospital
f.	Surgical	Treatment of patients involved in accidents, injury or conditions requiring immediate and serious attention.
g.	Medical	
h.	Gynaecology	Treatment of disorders specific to the female gender.
i.	Radiography	Provision of services mainly related to medical X-ray photography
j.	CSSD	Sterile Areas where major surgical interventions take place
k.	Operation Theatre	
l.	Outpatients	
m.	Dental	Facilities to provide for post-hospitalisation care or services not requiring hospitalisation.
n.	ENT	Public service complementing the service operated by private dentists.
o.	Ophthalmic	Ear, Nose and Mouth related disorders are treated by this Unit.
p.	Laboratory	Eye related disorders are treated by this Unit.

Source: General Hospital Gozo

Apart from the centralised facilities indicated above, a number of primary health care services are also provided by the Health Department. Primary Health Care is provided through 12 village clinics (*Bereg*). The services provided include:

- a. Immunisation
- b. School service
- c. Occupational Health
- d. GP Service
- e. Nursing Service

- f. Emergency
- g. Community Care
  - i. Nursing (Home Visits)
  - ii. Midwives
  - iii. MMDNA

The Mental Hospital houses around 71 beds for patients with mental disorders. The hospital is divided into three sections. The long stay section accommodates inmates with permanent disorders and has around 30 beds. The medium stay section caters for in/out patients i.e. normally for patients who sleep in at night and has 11 beds. The short stay section is intended as a casualty section.

The health department is also involved in the running of cemeteries. In Gozo there are ten cemeteries of which one is a state cemetery whilst the rest are church cemeteries. All the settlements, except for *Kercem*, *Fontana* and *Munxar*, have a cemetery. The main public cemetery is the *Santa Marija* at *Rabat* has 130 common graves out of a total of 700. (see **TABLE 7.4**)

**TABLE 7.4**

**CEMETERIES IN THE GOZO**

Council	Cemetery	Church/ State	Private Graves	Common Graves	Total
Rabat (Gozo)	"St. Mary's Cemetery", I/o Victoria	State	570	130	700
Ghajnsielem	Ghajnsielem Cemetery, Cordina Str.	Church	55	44	99
Gharb	"Cimiterju taz-zejt", St. Peter Str.	Church	49	53	102
Ghasri	"Ghasri Cemetery", Zebbug Rd.	Church	6	20	26
Nadur	"Nadur Cemetery", Triq it-Torri	Church	82	53	135
Qala	"Qala Parish Cemetery", San Kerrew Sqr.	Church	139	30	169
San Lawrenz	"San Lawrenz ", Tower Street	Church	216	n/a	216
Sannat	"St. Margaret Cemetery", Xewkija Rd.	Church	23	40	63
Xewkija	Xaghra Rd., I/o Victoria	Church	128	24	152
Xaghra	"Xaghra Cemetery", Steep Street	Church	68	35	103
Zebbug (Gozo)	"Zebbug Parish Cemetery"	Church	77	40	117
<b>Total</b>			<b>1,197</b>	<b>469</b>	<b>1,666</b>

Source: Strategic Planning Unit. Figures for San Lawrenz cemetery have been obtained from parish priest.

### 7.4.3 Issues

Gozo can be described to be quite well equipped to cater for a large proportion of medical services likely to be required by the community. There are two main areas that merit to be

addressed for further improvement. One is the further development of the existing Gozo general hospital to provide more adequate medical facilities and to be able to meet the envisaged demand of an increasingly ageing population. The other is to further equip the other health centres with facilities so that the resources at the Gozo general hospital are not overstrained. A main priority in this respect is the enlargement and possibly the relocation of the *Rabat* policlinic and its possible integration within the Gozo Community Centre envisaged for *Rabat*. Decentralisation also has to be coupled with a change of mentality whereby citizens of a particular settlement prefer to use the Gozo General Hospital facilities in order not to “disclose” their ailments to the immediate neighbourhood. Additionally, facilities which are available at the local health centres should be promoted further so that the local community utilises these services to the fullest. There is also scope for upgrading of the existing local health centre facilities in Gozo.

A problem with the limited facilities at the Gozo general hospital translates into having patients being transferred to Malta and their relatives having to commute to Malta to visit their sick friends or relatives. Currently, there are no facilities for visitors from Gozo to be specifically accommodated in an area near one of the main hospitals. It would be beneficial to provide for a small accommodation area for Gozitan visitors near one of the main hospitals or indeed as part of the new University Hospital at *Tal-Qroqq* in Malta.

Cemeteries also represent a land-use issue. Almost by default, cemeteries occur in areas ODZ. There are instances where older cemeteries were engulfed by buildings and now there is pressure to relocate these cemeteries to areas ODZ. In this respect, the issues which emerge are:

- a) New cemeteries in Gozo almost invariably take up good agricultural land.
- b) The existing Structure Plan for the Maltese Islands does not give adequate guidance on cemeteries.
- c) It is not clear whether the current burial practices will be maintained for the next ten years and beyond.
- d) Cemeteries may be objected to in view of implications on the aquifer.

## 7.5 Elderly

The population of Gozo is an ageing population. By the year 2010 it is envisaged that around 22% of the Gozo population will be composed of elderly people with age above 60. This translates into 6,739 elderly persons as opposed to an estimated 5,706 in the year 2000, an increase of 1,033<sup>46</sup>. There are other points of concern. The number of old senior citizens (ie. Over the age of 75) is also likely to increase.

The elderly population is a population with special needs (see Section 7.6). A longer living population has other implications. Apart from socio-economic implications (eg. workforce to pensioner ratio lower, fewer persons being willing and able to care for the elderly etc.), there are also direct land-use implications. For example the urban spaces need to be more accessible, the need for parking for the disabled will increase, there will also be increased demand for residences and institutions which cater for the needs of the elderly.

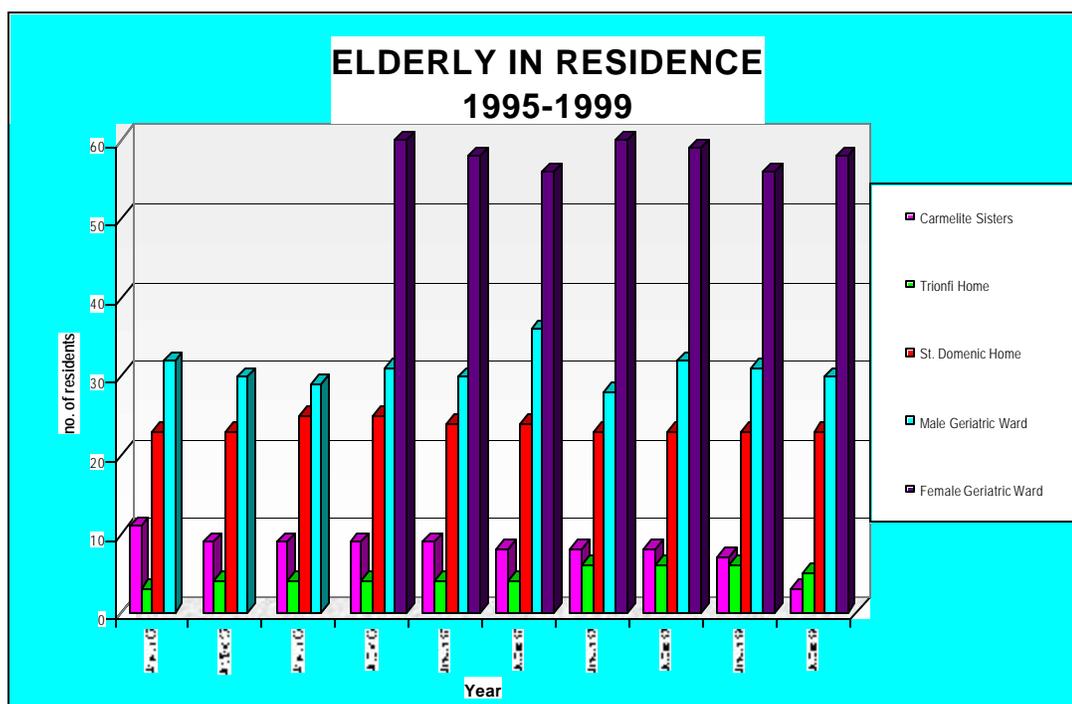
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<sup>46</sup> Based on the Planning Authority's Demographic projections calculated in 1999.

There are four main facilities for the elderly in Gozo. These are the geriatrics section within the Gozo General Hospital and three (church) old persons' homes – *Carmelite Sisters*, *Trionfi* and *St. Domenica's* home, all in *Rabat*. **TABLE 7.5** illustrates the changes from 1995-1999. Besides these homes, there is a day-centre, *St. Joseph*, which is operated by the Church at *Ghajnsielem*.

**TABLE 7.5**

**ELDERLY IN RESIDENCE (GOZO) 1995-1999**



Source- Ms. Joyce Dimech - Ministry for Gozo, 2000

It is rather difficult to predict for future land-use needs of the elderly in Gozo. This depends on many factors such as the activity of the elderly and whether they are bed-ridden, the provision of services to elderly staying at home, the sense of security provided by modern means of monitoring vital life signs and tracking of an elderly person's location etc. All the specialists in this field relate that it is very difficult to make concrete projections till the year 2010. What is almost definitely certain is that the number of dependent elderly is bound to rise and that support from the family (eg. through children caring for their parents and keeping them in a domestic environment) is likely to decrease. These factors translate into a higher demand for intensive geriatric care which will either take place through expansion on the site of the current Gozo General Hospital, through the conversion of existing large buildings or through the building of a purpose built geriatric hospital, the latter being the least likely of the options and the least favoured from a planning point of view.

## 7.6 Special Needs

In any society, there are people with special needs who have a right to live as complete and fulfilled a life as possible. In Gozo, it is estimated that there are two hundred persons with special needs of which 20% are bedridden, 20% wheelchair cases and 60% mentally or physically disabled<sup>47</sup>. However, people with special needs do not only include persons with a physical disability but also small children, pregnant mothers, mothers who use a pram or a push chair and elderly citizens. It is therefore important that the physical barriers which could prevent these individuals from easily accessing facilities within urban space, are either eliminated or else reduced to the lowest possible degree.

As from January of the year 2000, it has become obligatory for all public buildings to provide facilities for access to people with special needs<sup>48</sup>. The access problem is not only limited to buildings but also to external urban spaces. Pavements which are full of pot- holes or are built in cobblestones or are too narrow or blocked by planters, make commuting for people in a wheelchair rather difficult. The concept of reserved parking spaces is being slowly introduced but there is as yet no formalised approach on who should qualify for such a benefit. As a result, there are individuals who abuse of the service by claiming a need for a reserved parking space for a disable person just to avail oneself of assure parking in front of the place of residence.

Stairs represent a formidable difficulty to persons with special needs. In external spaces, stairs should be accompanied by a ramp of suitable material, incline and design so that people using wheel chairs, prams and push chairs could have easier access. The ramps should also be as close as possible to the parking areas. There should also be suitably designed hand-rails. These design considerations should be applied to all external spaces leading to commercial facilities, health related facilities, places of assembly, places of recreation, places of permanent or temporary accommodation and other social and community facilities<sup>49</sup>. Special attention should be given to the design of pavements, pedestrian areas, gardens, playing fields, piazzas and other public open spaces.

An Adult Training Centre in *Ghajnsielem*, which is managed by the church, was created in 1993 to train persons with a disability. This centre offers various services which facilitate integration into the community and in the year 2000, 30 persons were attending the centre. A respite care centre is being built adjacent to the Adult Training Centre. The three-storey building is indicated to have a capacity of 32 beds. The enterprise is managed by the church and the voluntary sector, however, it is partly funded by government and a number of full-time staff are paid by government.

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<sup>47</sup> Data obtained through Ministry for Gozo (1999).

<sup>48</sup> "Access for All" - a policy guidance document published by the Planning Authority.

<sup>49</sup> These considerations were indicated during meetings with Mr. Michael Bezzina and Ms. Marisa Scerri from the Department for the Welfare of the Elderly and Ms. Joyce Dimech (Elderly and Special Needs Unit)

## 7.7 Social Amenities

Local recreational facilities for the community are considered to be essential in order to maintain a balanced and healthy lifestyle. Formal and informal recreation help the body to rejuvenate vital energy and to prepare oneself for challenges encountered in everyday life. They are also essential to alleviate and relief the adverse effects of stress. Apart from well evident health and psychological benefits, sports and recreation often help in promoting socialisation, discipline and competition. Additionally, recreation has become the world's largest industry since tourism is essentially a form of recreation.

In terms of formal recreation, Gozo is fairly well equipped, in fact it is more equipped than one would expect for an island of only thirty thousand permanent inhabitants. There are a number of rural and urban formal and informal recreation facilities which serve the community quite well. However there is ample scope for providing improved access for these facilities, to upgrade them and to introduce additional recreational facilities in certain areas. A more detailed discussion of recreational issues is found in **Chapter 10**.

## 7.8 Settlement Community Facilities

### 7.8.1 Administration related buildings

Most of the administrative buildings in Gozo are found concentrated in the Gozitan capital at *Rabat*. Most of the relevant offices are located within one complex at *Pjazza San Frangisk*, which includes the office of the Minister for Gozo. This arrangement has a number of advantages as the public is spared the need to commute unnecessarily from one area to another. The same complex accommodates government departments such as Agriculture, Public Works, Lands Registry, Social Services, Inland Revenue, Labour and Emigration and so forth. The ministry building complex also accommodates a number of halls where meetings and conventions can take place.

Many of the settlements in Gozo have local administration related buildings such as police stations. Meetings with local councils as well as other agencies and authorities indicated that in general, Gozo is well provided for in terms of local administration related facilities. A number of the existing facilities however need upgrading in terms of layout and distribution of internal spaces, office equipment and furnishings.

### 7.8.2 Local Councils

Each respective local council has its offices either in a location which is central to the settlement or which is incorporated in a public school. Some local councils have undertaken considerable renovation work to upgrade their premises and some have opted to be relocated from their former premises. The location of all the local council offices is generally considered as being adequate for the needs of the community but there may be some instances where the local council may need to expand or relocate in future as more responsibilities are envisaged to be handed from central government to Local Councils.

### 7.8.3 Church related

The church represents the focal point of Gozitan community life. Basically all of the main rites of passage in a person's life are conducted in the parish churches. The church also serves as a place of congregation on Sundays and public holidays, during the village festa and during mass. The planimetry of most of the settlements in Gozo as well as the more important public and private buildings are almost invariably centred around the parish church.

Apart from the main churches, the ecclesiastical establishment in Gozo has a number of facilities ranging from monasteries and convents, schools, homes for the elderly, religious training facilities clubs and other buildings which are intended to cater for a number of religious and the secular requirements of the community. These facilities are considered to be important to the social fabric of the community and provided that other planning parameters are observed and that such facilities are limited to areas designated for development, their upkeep, improvement and provision should be encouraged<sup>50</sup>.

### 7.8.4 Places of Assembly

There is a wide range of facilities which serve as places of assembly. It is very difficult to categorise this kind of development, as basically every building where human beings congregate is a place of assembly. However, for the purpose of this section, places of assembly are considered to be those mainly non-commercially oriented buildings and open spaces where human being congregate for the specific purpose of socialising. These mainly include assembly halls, clubs, and piazzas. Most of these buildings are intended to provide some kind of indoor or outdoor recreation or to provide a place of assembly to undertake a formal function. Theatres, cinemas and heritage show halls, for example, are mainly intended to provide for recreation whilst wedding halls are mainly intended to accommodate a formal celebration after marriage. Most of the places of assembly in Gozo are located in *Rabat* or in the vicinity of *Rabat*. There are also a number of wedding halls that are found outside development schemes.

It is also important to note that some tourism related facilities such as hotels, in some cases, also cater for requirements which serves the same function as other dedicated places of assembly. The same applies to other tourism or recreation related facilities such as discos, night clubs and restaurants.

## 7.9 Policy Approach

### 7.9.1 General

A good provision of social and community facilities constitutes one of the benchmarks of the quality of life in a settlement and its environs. Given the size and resources at the disposition of Gozo, the island is relatively well endowed with a good number of social and community facilities. This does not however imply that there is no room for improvement in terms of amelioration to the existing facilities and the incorporation of new facilities.

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<sup>50</sup> The need for additional community facilities was highlighted during a meeting with His excellency Mons. Nikol Cauchi, Bishop of Gozo.

### 7.9.2 General Scenarios

The provision of social and community facilities in Gozo can be generally described as being good. It is therefore envisaged that in the future, the main trust shall be mainly to upgrade existing facilities. Provision and upgrading need mainly to be guided by demography and cultural trends. For example, if projections indicate less child-births and current schools are under utilised, it is pointless to provide more schools. Conversely, since Gozo is envisaged to experience an increase in the percentage of elderly people, facilities for this age bracket need to be provided. The main trust in physical intervention is expected to be in the provision of urban and rural amenity in order to enhance the identity of the various spaces, to facilitate movement from one space to the other and to render movement through an area enjoyable.

Some decisions depend on the prevailing cultural attitudes. For example, demography indicates that annual deaths will increase as a result of a larger and older population. If current cultural conditions prevail, a demand for more graves or new cemeteries can be perceived. On the other hand, if it becomes culturally acceptable and economically feasible to employ cremation techniques, or for example to recycle graves at a faster rate, then the need for additional land will almost certainly decrease. Therefore demand for land may not be necessarily directly correlated with demographic trends. The same argument applies to demand for wedding halls, party or band clubs, other places of public assembly and so forth.

Uncertainty also exists in the provision of facilities for the elderly. Whilst it is clear that there will be more elderly in Gozo by 2010, it is not clear where these will reside. Ideally, elderly people should live within the community... however this depends mostly on the state of health of the individuals and whether they feel secure enough to live on their own or supported by their own families. When senior citizens become dependent on extensive medical care, it becomes almost impossible to retain them at home and therefore the need to provide specialized geriatric care. Therefore it becomes imperative that if this occurrence eventually materialises, there should be adequate space and infrastructure to accommodate the envisaged requirements.

### 7.9.3 Education - Objectives and Strategy

Based on the findings of **Section 7**, the main objectives for Education can be summarised as being intended to:

- Continue to upgrade the existing educational facilities.
- To render schools more accessible to youngsters and people with special needs.
- To maximise utilisation of existing schools through utilisation in extracurricular hours.
- To explore the need for private schools through a feasibility study.
- To encourage utilisation of modern telecomms facilities in the educational sector.

The general approach for education is to continue to enhance the existing facilities but in the public sector, there is very little scope to continue to enlarge the existing schools. As far as the building of the new public schools is concerned, the only local council which cannot avail itself of primary education facilities within walking distance is *Munxar*. There may also be some scope to convert existing buildings within development schemes into small, pre-formal schooling facilities, especially where all the other planning criteria are satisfied. There is also scope to accommodate other non-curricular uses which are compatible with the layout of the school (eg, evening drama

courses, clubs, district libraries etc.) and which take place after teaching hours. This approach is in line with the provisions of Structure Plan policy **SOC 14**.

Secondary school facilities are concentrated in *Rabat* and this trend is envisaged to continue. The need for a Girls' private secondary school for Gozo has been highlighted. Such a school may not necessarily be located in *Rabat* given that at secondary school level, vehicular transport to the relevant school is the norm. The relevant site should be located within development boundary schemes. The possibility of utilising an existing under-utilised public school to this effect should also be explored subject to the provisions of Structure Plan policy **SOC 13 to SOC 16**. In such an eventuality, the private sector should be responsible to provide adequate public school facilities in the vicinity of the relevant community at its expense. A buffer zone should also be left around the existing secondary school complex at *Rabat* to cater for any eventual expansion or other education related facilities.

At the tertiary level, Gozitan students still have to commute to Malta to undertake their studies there. Whilst it is possible to envisage that the Gozo branch of the University of Malta would continue to consolidate operations, it is rather unlikely that Gozo would offer services at par with those offered at the University of Malta. There are a number of options that could be considered. If the University of Malta offers more distance learning courses, this may encourage some students to continue with their work and earn their qualifications without the need for daily, weekly or seasonal commuting. Another possibility would be to have tele-conferencing facilities whereby lectures could be accessed from a remote terminal. Communication with fellow students can also be maintained via the Internet especially if equipped with real-time video communication facilities. The current Gozo branch of the University of Malta can continue to offer specialised courses which are intended for Gozitans, Maltese and foreigners who benefit from the experience of a quite rural setting. The small size of Gozo also offers the opportunity to undertake manageable pilot studies on the island.

#### 7.9.4 **Health - Objectives and Strategy**

The health sector constitutes another important service for the community. The findings in this report indicate that health related land use should:

- Ensure that Gozo is adequately provided for in terms of health infrastructure.
- The main health related facilities shall continue to be based around the Gozo General Hospital
- The existing *Rabat* health centre needs to be upgraded and relocated to the Gozo Communal Centre
- Render all existing and proposed facilities fully accessible to persons of all ages and to persons with special needs.
- Existing facilities for the rapid transfer of patients to Malta will continue to be upgraded
- The option of providing (on mainland Malta) temporary accommodation facilities for relatives visiting Gozitan patients in Malta should be encouraged.
- A detailed subject study on cemeteries should be undertaken to determine the policy direction for this type of land-use.

The General Hospital in Gozo caters quite well for the needs of the community and there has been a continuous process of upgrading over the years. The existing configuration of the site is such that it permits future expansion (in line with policy **SOC 2**). Therefore, provided that all the other planning criteria are observed, there should not be insurmountable difficulties on this front and a suitable buffer zone to safeguard land for hospital use is thought to be adequate.

The *Rabat* polyclinic is definitely not adequate for current needs. It is therefore envisaged that such health facilities would be incorporated within the proposed Gozo Communal Centre. This proposal satisfies the criteria established by policies **SOC 3** and **SOC 8**. There is no envisaged need for other local health centres and upgrading of the current facilities together with more efficient management of these facilities should suffice.

The ageing population in Gozo is envisaged to increase demand for acute geriatric care facilities. Some of these facilities can be provided within the Gozo General Hospital. Currently, the approach towards geriatric care is to provide it within the community but this may not always be possible. However, with acute geriatric care, the number of inmates needs to reach a threshold in order to be financially viable. Therefore, the private sector, church and the public sector would be encouraged to collaborate to provide such facilities within areas schemed for development. This approach is compatible with the provisions of Structure Plan policy **SOC 6**.

Cemeteries represent another land-use problem in Gozo. The issue can be subdivided into three areas ie. extension to existing cemeteries, relocation of existing cemeteries and construction of new cemeteries. All three are associated with various difficulties such as adverse impact on the landscape, take-up of good agricultural land and potential contamination of the aquifer. To this effect, there shall be a general presumption against any of the options. Notwithstanding, proposals to intensify use within the existing cemetery curtilage will be encouraged provided that any planted mature trees will be retained and additional adequate landscaping measures are taken.

#### 7.9.5 **Elderly and Special Needs - Objectives and Strategy**

Elderly people constitute just one category of persons with special needs. Persons who suffer injury, people with disabilities and children constitute other sectors of the population with special needs. It is imperative that as much as possible, facilities are provided to enhance accessibility and enjoyment of surrounding spaces. Elderly and special needs related land-use policy therefore needs address the following objectives:

- Rendering sidewalks, public amenities and places of assembly more accessible to the elderly and people with special needs.
- Encouraging day and night centres for the elderly within existing areas designated for development.

The elderly and persons with special needs (in general) have additional difficulty in commuting from one point in a settlement to another. The main thrust of land-use policy shall be to facilitate commuting within buildings and within the built-environment. Guidelines which relate to access for all should continue to be observed. Public works should pay special emphasis to construction of areas which facilitate access to people in wheelchairs and other people with special needs. This attention should not only be directed to the operational phase of the relevant

project but also to the construction phase so that adequate alternative routes are found. The relevant authorities should also pay attention not to block public access ways with articles such as planters, bollards or lamp-posts.

Facilities for the elderly should include for the provision of more day centres and night centres. The facilities should be sought according to the provisions of Structure plan policies **SOC 18 to SOC 20**. Therefore, such facilities may be accommodated in areas schemed for development. Preference will be given to projects which make intelligent use of existing buildings which are adequate from a planning point of view to such purposes. Proposals to construct day or night centres outside areas designated for development shall not be acceded to.

## 8. UTILITIES AND SERVICES

### 8.1 Introduction

In modern life, the provision of a good infrastructural support and public services is considered essential to maintain a good quality of life and to promote investment. This chapter is intended to expound the current situation in relation to the provision of services in Gozo and Comino, the current problems and opportunities and to directions that may be explored to improve on the current situation.

Gozo and Comino depend on mainland Malta for the provision of most of the services except for sewage disposal, solid waste disposal (to date) and partially on water supply. Given the critical nature of these services, it is important to explore ways of minimising interruption to services and to seek practical alternatives.

### 8.2 Policy Background

Policies relating to the provision of services are mainly listed under the heading Public utilities in policies **PUT 1** to **PUT 28**. The first four **PUT** policies are strategic in nature and seek to encourage interdepartmental collaboration in the provision of services and to adopt a sustainable approach so as to maximise the utilisation of scarce resources and minimise of the production of waste. The main gist behind these first four policies is one of integrated management. Although some progress has been registered in interdepartmental communication, much remains to be done in achieving a truly workable solution in integrated management on the Maltese Islands.

**PUT 5** specifically instructs the Local Plans to *include proposals for the layout and siting of primary utility services, structures and facilities*. **PUT 6** promotes the integration of infrastructural network management through a GIS system. It is known that a number of agencies, not the least of which is the Planning Authority, already operate a GIS network but much tighter collaboration and much wider networking is needed before the aims of integrated management suggested through policies **PUT 1** to **PUT 4** can be fully achieved.

Water is addressed through policies **PUT 7** and **PUT 8**. **PUT 7** is a scenic impact mitigation policy and is intended to address the adverse visual impact created through reservoirs. **PUT 8** on the other hand encourages the use of recycled water or of seawater wherever appropriate as a water conservation measure.

Sewerage is addressed in policies **PUT 9** to **PUT 12**. The national sewerage subject study is addressed through policy **PUT 9** whereby an update of the national sewerage Master Plan till year 2010 is indicated. **PUT 10** raises the need of environmental impact analyses for projects related to sewerage treatment and disposal. **PUT 11** suggests sites where sewerage treatment plans may be located. Amongst others, a site due north of *Mgarr ix-Xini* in Gozo is mentioned. Although a site for a sewerage treatment plant has been indicated in the *Ras il-Hobz* area, to date (yr. 2000) the treatment plant has not been constructed.

Solid waste is perceived as a major problem in the Maltese Islands and it is therefore addressed through a considerable number of policies; from **PUT 13** to **PUT 20**. **PUT 13** relates to the position adopted by the Planning Authority in processing of applications likely to give rise to generation of waste and encourages the consideration of alternatives, the minimisation of waste, the detoxification of waste and the safe transport of waste. The need for environmental impact analyses is again highlighted in **PUT 14** together with requirements to protect the natural and cultural environment and to provide a suitable after use. **PUT 15** highlights the need of waste separation at source whilst **PUT 16** indicates that strategic sites for waste disposal need to be identified. **PUT 17** indicates the utilisation of a controlled landfill and the precautions that need to be taken in operating such a landfill. No site apart from that which has been used for decades (ie. The *Xaghra* landfill) has been identified in Gozo. **PUT 18** relates to safe toxic waste disposal whilst **PUT 19** relates to the Local Plan giving due consideration on the siting of waste transfer stations. The location of a transfer station at the *Xaghra* landfill has already been considered. The formulation of a national Waste Management Subject Plan is indicated in **PUT 20**. The draft of this plan has been finalised and is currently undergoing a consultation process.

Electricity is addressed in policies **PUT 21** to **23**. **PUT 21** relates to a new 132 kV distribution **PUT 22** indicates the need for EneMalta to prepare a 20-year development plan whilst **PUT 23** directs towards the under-grounding of electrical power supplies. Relatively little progress has been achieved especially on the last two policies.

Telecomms are addressed through policies **PUT 24** to **26**. **PUT 24** relates to Telemalta, which has since become Maltacom, and the need for a 20 year development plan. During the Structure Plan period, the whole telephony network has been changed to a digital system and mobile telephone communication has been introduced. **PUT 25** relates to under-grounding of the network and although progress has been registered on this front, much remains to be done. **PUT 26** relates to telecomm equipment standards together with the need of relevant enforcement.

The last services to be addressed are posts, through policies **PUT 27** and **PUT 28**. The first relates to the need of a 20-year development plan with emphasis on the siting of new facilities and use of redundant ones.

## 8.3 Electricity

### 8.3.1 Generation

In Gozo and Comino, there are no large-scale electrical power generation plants. Thus the islands are practically totally dependent on Malta for power supply. Power generated at the *Marsa* or *Delimara* power stations is fed through a system of high voltage lattice towers to *Mellieha* and then to *Marfa*. The high-tension power lines then leave *Marfa* Peninsula as submarine cables, and then re-emerge at Comino. There is a distribution centre due south of the hotel at Comino. Power is then conveyed via submarine cables to *Qala* to be distributed around Gozo through a network of mainly pole mounted wires. Small-scale generation is found at strategic locations such as the Gozo General hospital. A significant number of commercial outlets and some private dwellings opt to have emergency electrical generation capability.

### 8.3.2 Distribution

The power arriving at *Qala* is conducted to a distribution centre through 33 KV overhead lines to be transformed to lower voltages through a network of substations. The voltage is then transformed to 11KV, 415 V or 240 V, according to exigencies. Distribution of the higher voltages (ie. more than 11 kilovolts) is often transmitted underground<sup>51</sup>. Lower voltages are normally conveyed via wires mounted on poles or on wires mounted on brackets fixed to facades of buildings. This aerial method of distribution is rather unsightly, especially in Urban Conservation Areas and in rural areas.

Operational problems with the existing distribution network include power cuts. Sometimes, these are induced through external man-made or natural causes. Apart from problems associated with generation at the *Marsa* or *Delimara* facilities, man-made disruptions are usually induced through accidental mechanical severance of cables. Additionally, power cuts can be attributed to maintenance work and the operational failure of elements in the supply system. Large-scale power cuts in Gozo can also result from storm damage to the Gozo distribution network or damage to the Northwest Malta distribution network. Storm damage (eg. through lightning strikes or high wind damage) in Malta can therefore cause blackouts in Gozo. Periods of cold spells or extremely hot weather often place extra demand in terms of electrical load. Sometimes, this leads to damage of one or more components in the distribution system.

### 8.3.3 Supply and Demand

The demand for power in Gozo have been steadily increasing and communication with EneMalta indicates that further upgrading of the power transmission system would be necessary to cater for the needs envisaged within the local plan time horizon. At the present point in time, it is envisaged that the Gozo Distribution system needs upgrading. A requirement for a centrally located distribution centre in the vicinity of the *Xewkija* Industrial estate has thus been indicated by EneMalta<sup>52</sup>.

EneMalta also has plans to install a fibre-optic cable adjacent to its power lines to monitor performance of its electrical network. It is envisaged that this cable can also be leased to multimedia distribution and phone/data network operators who are interested in utilising the fibre-optic cables.

An issue which needs to be actively considered is power supplement through renewable resources. There is great potential from solar energy and to a less extent from wind energy. The main problem with the current technologies that utilise renewable resources is that the energy collecting apparatus needs to be very land-use intensive in order to generate appreciable amounts of energy. Wind turbines as well as solar collecting panel farms are not visually complementary to rural landscapes. In this respect, there is extensive literature relating to the experience of countries in north-western Europe and the western United States. Any large scale renewable energy projects on land, either on Gozo or on Comino, would have a very serious detracting impact on the landscape and most probably, this impact would be commensurably greater than any electrical generation benefits. Furthermore, the economies of scale may be too limited to

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<sup>51</sup> Note: A meeting with EneMalta has indicated intentions to underground the whole 11KV network on Gozo.

<sup>52</sup> Note: During a meeting between the Local Planning team and EneMalta officials.

justify the entailed capital and recurrent expenditure. From a planning point of view, exploration of technologies which can be accommodated on offshore areas would be more appropriate. The emphasis needs to be directed towards the conservation of energy rather than the creation of extra generating capacity to accommodate increase in demand – a significant proportion of which may be wasteful. Solar collecting panels on the roof of factories at *Xewkija* may be another option worth exploring.

## 8.4 Water

### 8.4.1 Collection

The main source of water in Gozo originates from the approximately 500 mm. of precipitation that on average falls on the islands per annum. A percentage of this water is lost mainly via roads to the sea and via evapo-transpiration whilst the rest is absorbed into the ground or channelled into man-made water retaining structures. Water is stored underground either in permeable rock overlying an impervious clay substratum or else as a freshwater lens overlying sea-water in permeable rock. A system of dams has also been built in Gozo to collect water running along valley floor watercourses. This water is a source of second-class water used mainly for agricultural purposes.

During heavy rain, considerable amounts of rainfall are channelled through narrow valleys. Rainfall rates higher than around 25 mm. per hour usually cause flooding related problems. The main problematic areas occur at *Marsalforn* and *Xlendi* where floodwater is known to have caused considerable damage to property. However, other areas, especially between *Sannat* and *Xewkija* as well as the valleys, are known to have suffered from the effects of prolonged episodes of torrential rain. In some cases, agricultural land is known to have remained submerged for weeks. Although dams buffer against the impact of sudden downpours, the rainfall intensity sometimes is such that these have little effect on the volumes of water that pass through the watercourses. Roads and steep smooth surfaced areas offer little resistance to the flow of water with the result that large volumes of water at relatively high speeds cause considerable amounts of damage and erosion (including damage to rubble walls). Therefore, measures to slow down the movement of water (eg. planting of cane reeds) can be useful to mitigate the impact of flooding. Measures to divert water to the fields (rather than leading it towards the sea where it is lost) can also help to reduce the water load and thus minimize damage.

### 8.4.2 Extraction

Water is normally extracted from underground natural sources through boreholes. Water is also extracted from other sources such as dams as indicated in **Section 8.4.1** above. In some cases, wind power is used to extract subterranean water but this method of extraction is falling into obsolescence in view of a preference to extraction through electrical pumps. There are no reverse osmosis plants in Gozo and there are no plans to build one in Gozo within the foreseeable future<sup>53</sup>. A number of unlicensed wells are reported in the WSC report of 1997/1998 with the figure for Gozo amounting to 19 wells.

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<sup>53</sup> Meeting of Local Plan team with Dr. John Mangion, Water Services Corporation

The Water Services Corporation Annual Report 1998/1999<sup>54</sup> indicates that practically all the water used for domestic consumption is extracted from the Mean Sea Level aquifer; the annual amount extracted being around 2.4 million cubic metres.

**TABLE 8.1**

**GOZO WATER PRODUCTION BY SOURCE - 1998/1999**

SOURCE	AMOUNT IN M <sup>3</sup>
<b>GROUNDWATER</b>	
Mean Sea Level Aquifer	2,410,379
Perched Aquifer	0
<b>Total Groundwater</b>	<b>2,410,379</b>
<b>DESALINATION</b>	
Sea water	0
Brackish water	0
<b>Total Desalinated Water</b>	<b>0</b>

Source - WSC annual Report 1998/1999

In the extraction of water from Gozo subterranean sources, the Water Services Corporation used 1.367 million KWhr of electrical consumption for boreholes and 0.119 million KWhr for extraction through pumping Stations. In Gozo, pumping stations extracted 216,580 m<sup>3</sup> in 1998/1999 whilst boreholes extracted a total of 2,196,865 m<sup>3</sup> during the same period<sup>55</sup>.

Risks to extraction mainly include contamination of resources. There are various sources of possible contamination but the most conspicuous are agricultural contaminants (eg. pesticides, fertilisers), contamination from sewage, contamination from soluble chemicals originating on land and contamination origination from offshore sources (esp. oil spills). Over extraction through illegal boreholes has been indicated as a problem as this method of extraction results in over-pumping and thus encourages infiltration of seawater into aquifers.

#### 8.4.3 Storage

Water intended for domestic distribution is pumped to a number of large reservoirs which are located at high points to subsequently distribute water by gravity. This system ensures that water supply pressure is kept fairly constant and in the event of a power failure, water supply can be maintained till the reserves in the reservoir are exhausted. There are three fairly large covered reservoirs at *Ta' Cenc* and another major fresh water reservoir lies at *Zebbug*. Other smaller reservoirs can be found in other areas in Gozo.

Storage of second-class water is mainly achieved through retention behind dams constructed in some valleys. These serve to collect surface run-off from roads and surrounding fields. The stored water can be pumped up by cultivators from nearby fields or through water bowsers.

<sup>54</sup> WSC Annual Report 1998/1999 page 11 Table 2

<sup>55</sup> WSC annual Report 1998/1999 Table 3 and Table 5

#### 8.4.4 Distribution

Fresh water distribution occurs through full-bore pipes under pressure supplied either by gravity or maintained through electrical pumps. Apart from the reservoirs, there are a number of pumping stations which maintain fresh water supply. Pipes are normally laid under vehicular carriageways to facilitate access when maintenance requirements arise although this practice also gives rise to considerable road disruption when pipes need to be changed. Additionally, given that communication between service providers is not optimum, disruption to other services often occurs when maintenance services are being carried out<sup>56</sup>. Upon reaching destination, water is often stored on roof tanks and supplies the whole building by gravity. In general, the Water Services Corporation indicates that water losses through the distribution system in Gozo are relatively small although leakages are lately experiencing an increase which reflects the age and condition of the network<sup>57</sup>. Around 9 million litres of tap water are consumed every day. At Mgarr, there is a small pumping station which provides for a very limited supply of second class water.<sup>58</sup>.

#### 8.4.5 Supply and Demand

Demand for fresh water has experienced a substantial increase in the late 1990's when changes in water tariffs were introduced. To illustrate, the demand for the year 1999 was around 10 million m.<sup>3</sup> per annum less than the demand for 1994. This represents a decrease of around 12%. It is presumed that these measures were instrumental in arousing a greater water conservation conscience and consequently the demand has fallen and is now stabilising. It does not appear that significant surges in demand will be experienced in future and therefore major operations in order to significantly upgrade the water supply system in Gozo are not envisaged.

A system of additional dams may merit further consideration in order to better utilise rainwater in Gozo. Dams buffer against rain induced torrents, provide a means of aquifer discharge and a ready supply of second-class water for agricultural purposes. Construction of dams should only be undertaken after comprehensive integrated studies which cover surface water management for the whole of the island. Inadequate designs, inappropriate locations or shoddy workmanship will result in much more harm than benefit. There is also scope for utilisation of cisterns in residential and commercial dwellings in order to reduce the surface water and sewer load during torrential rain and to complement the fresh water distribution system. It has been reported that some surface water disposal facilities have been blocked<sup>59</sup> with the result that localised flooding takes place during episodes of torrential rain. If these subsurface culverts are opened and their water channelled to second-class water reservoirs, much better use would be made of such a scarce and precious resource as rainwater. There is also ample scope for the utilisation of treated water from the sewage plant envisaged for *Ras il-Hobz* for irrigation purposes.

<sup>56</sup> This problem has been highlighted during a number of meetings with Local Councils.

<sup>57</sup> The Water Services Corporation Annual Report 1999-2000 indicates on pp. 12-13 that Gozo has been indicated to undertake a pilot study in calculating an Infrastructure Leakage Index (ILI)

<sup>58</sup> Based on minutes of meeting between PA and WSC officials on 15/10/97 (ref. GZ/Min/025/97)

<sup>59</sup> One such instance was reported by the Sannat Local Council.

## **8.5 FUEL**

### **8.5.1 Use**

In Gozo, fuel is mainly utilised transportation, cooking, heating and operation of some forms of mechanical plant. No fuel is extracted on the island or from the waters surrounding it and no form of fuel is refined on the Islands (ie. Gozo and Comino). Transportation fuel is mainly delivered via petrol stations whilst marine related fuel is delivered via stations located at the main berthing areas. At the present point in time, there are no fuel facilities to cater for helicopter transport as given that the distances involved are relatively short, the aviation fuel is carried from Malta and sufficient for the round trip.

### **8.5.2 Storage**

Transport related fuel is mainly delivered via bowsers and stored in underground tanks at petrol stations. There are three types of fuel available from petrol station namely leaded petrol, unleaded petrol and diesel. Kerosene is also used but this is usually delivered to its destination via fuel bowsers. Liquid Petroleum Gas (LPG) is delivered via portable tanks that are transported on land by commercial trucks and delivered to the many households. A development permit application was submitted to the Planning Authority, requesting to construct central facilities in Ghajnsielem for the bulk storage of LPG gas. This application has not yet been determined and the relevant Environmental Impact Assessment still has to be submitted.

There are obvious risks in the transport and storage of fuels and the practice is to attempt to locate bulk storage areas away from residential areas and places of work or recreation.

### **8.5.3 Supply and Demand**

Demand for fuel used in domestic and commercial applications would be expected to increase with population, improvement in lifestyle and increase in transportation movements (ie. more cars or more frequent marine trips). No concern has been expressed<sup>60</sup> regarding a foreseeable problem relating to the supply, storage and distribution of the various kinds of fuels.

## **8.6 Telecomms**

### **8.6.1 Background**

Modern means of instant communication are considered as an important measure of progress of a particular society. Apart from being used to keep contact with other human beings and to alert the relevant agencies when an emergency arises, modern communications are indispensable to business, education, leisure and social activities. In order to keep abreast of the latest developments (both locally and abroad), it is indispensable to have a good telecommunications network.

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<sup>60</sup> None of the agencies or individuals with whom meetings were held expressed concern over the fuel situation in Gozo.

### 8.6.2 Telephony

Telephony in Gozo<sup>61</sup> is networked with the telephone system in Malta via a system of Microwave links. There is a single exchange at *Xewkija* which connects Gozo with the rest of Malta. The system also accesses the international telephone links via services provided through mainland Malta. A digital system is currently in operation. Apart from voice communication, telephones have become increasingly important in conveying fax messages, electronic mail, Internet and other forms of data exchanges. At the present point in time, it does not appear that major intervention needs to be undertaken to drastically upgrade the existing network.

Cellular phones have been introduced in the 1990's and these have in part utilised the landlines which are operated by Maltacom. These phones have required a network of transmitters to be located at strategic places to ensure a good coverage. Fortunately, as pre-existing infrastructure was used, there was little need to erect unsightly masts to accommodate these facilities. However, radio links installed at *Cittadella* are rather unsightly and should be relocated to a more suitable position in view of the visual incompatibility with this very important monument.

### 8.6.3 Television

Apart from the reception of four Maltese terrestrial television stations, Gozo is well covered by a system of cable television which is provided from Malta via a microwave link. Most of Gozo is also able to receive more than twenty terrestrial television stations transmitted or relayed from Sicily. There are no television transmitter masts in Gozo and none are envisaged for the foreseeable future. A number of TV relay transmitters have been erected to facilitate terrestrial TV reception in some areas but these have been located on short masts on buildings within the Development Zones. In spite of the advent of cable television, Yagi<sup>62</sup> antennas are still retained to “adorn” the Gozitan rooftops. Fortunately, because of predominantly better reception conditions, the TV antennae are rather small and in most cases relatively inconspicuous. Higher and more visually prominent antennas can be found at *Ghajnsielem* and in certain areas in the south of *Rabat (Victoria)*.

Like mainland Malta, Gozo lies in the fringe area of satellite TV reception intended for mainland Europe and hence for good reception, satellite dishes have to be around 1.2 meters in diameter. With the advent of more powerful satellite TV signals and digital television, it is most likely that smaller dish sizes will be required and hence the adverse visual impact will be more easily contained.

### 8.6.4 Radio Communication

Radio services for Gozo can be subdivided into three main categories:

- a) Broadcast
- b) Services and Commercial
- c) Amateur

<sup>61</sup> Most of the information was obtained during a meeting with Maltacom representatives.

<sup>62</sup> The type of antennas most commonly used for television reception.

Broadcast services originate from various localities but the national services are mainly transmitted via the *Gharghur* master antenna on mainland Malta and relayed through a number of small repeaters located in Gozo. All Maltese radio stations are transmitted on the FM band with the exception of Radio Malta 1, which is transmitted from mainland Malta on the Medium Wave band<sup>63</sup>. There is one radio station which is located in Gozo but transmits from mainland Malta. A number of Sicilian FM stations are received in Gozo together with other services transmitted from other countries on other bands. A number of community radio services also operate from Gozo and are transmitted from small antennae located on high points.

A number of operators, including the Police, the Armed Forces, the Civil Protection Department and other government and parastatal bodies, maintain radio contact through dedicated radio communication systems. Most of the transmitters are located on masts erected on buildings. Apart from the repeaters located at *Cittadella*, the antennae are not particularly offensive as they are mingled with the rest of the TV reception antennae on rooftops. Other commercial operators use similar transmission system for communication purposes. In all cases, the systems employed are not particularly conspicuous and in general do not take up much space. Specialised operators such as the MIA<sup>64</sup> use facilities such as those at *Kercem* for air navigation purposes. These antennae require a buffer zone with pre-established planning policy guidelines to avoid interference with this critical service<sup>65</sup>. The military also operate a number of coastal radars; these are normally located on top of historic coastal towers and generally do not complement the historic and architectural value of the building.

A sizeable number of citizens operate radio apparatus to transmit and receive radio signals on the amateur bands. Dedicated antennae are fairly large and conspicuous but fortunately the number of operators is relatively small. Much more common are the operators on the Citizens' Band, the use of which band was liberalised in the mid-1990's. The antennae employed are normally of the whip type and are a few metres long. They represent an added rooftop "adornment" amongst the rest of the TV antennae.

#### 8.6.5 Data Links

A number of commercial operators as well as some public agencies maintain data links via radio. The transmitting and receiving equipment is generally small and compact and does not entail any particular visual obstruction save on occasions when the instrumentation is installed on or in close proximity of building or sites of high architectural value. If current or envisaged technologies are employed, radio data links are foreseen as using mainly existing Transmission or relay facilities found in Gozo and Comino. Other data links are also possible via the existing telephone, cellular phone or cable television networks. In future, fibre optic cables are envisaged to supplement some of the existing land-line communication networks. This latter option is not envisaged to cause undue land-use problems as the optic fibre cables are normally run adjacent to the other communication services.

Whilst most modern local data links entail the use of small non-land intensive and general unobtrusive equipment, this is not always so. An exception has occurred in *Gharb* where a long

<sup>63</sup> Excluding the "Voice of the Mediterranean" which is transmitted through foreign transmitters.

<sup>64</sup> MIA=Malta International Airport

<sup>65</sup> This requirement was established during a meeting with MIA representatives.

wave antenna was erected as part of a system to track objects on the Maltese Islands and its territorial waters. This particular antenna is around 50 m. high and the site curtilage which is fenced covers an area of around 1000 sq. m. However, it is unlikely that any more such antennas will be constructed in the foreseeable future as the trend is to employ ever higher frequencies which entail the use of smaller antennae.

#### 8.6.6 Supply and Demand

The demand for the use of telecommunications equipment is expected to increase substantially in the coming years in view of greater use of services such as mobile phones, Internet services and video on demand. From a land-use point of view, it is not expected that the required intervention to upgrade these services will have a great visual impact or be very land-use intensive. In most cases, the existing infrastructure can accommodate the upgrading or else the upgrading should complement the existing infrastructure. It is most important that future intervention are, where possible, under-grounded so that the cacophony of wires “adorned” building facades are removed from view. If this is not possible, then wires and cables should be passed in such a way as to be the least obtrusive from street level and should be neatly bundled together. Transmitting equipment should as much as possible avoid *Cittadella*, church buildings and other buildings and monument of architectural, cultural and historical value and should where possible be installed on common transmitting facilities. The possibility to convey inter-island data through fibre-optic cables bundled with the underwater power lines is being considered<sup>66</sup>.

## 8.7 Sewerage

### 8.7.1 Sewerage Network

The sewerage network in Gozo is mainly based on a system of collection pipes which convey the liquid waste origination from urban and rural areas to a system of pumping stations which ultimately lead to offshore disposal. Most of the system operates under gravity and therefore the pipes are laid to falls to achieve the necessary gradient. Inspection chambers are incorporated at regular intervals to facilitate inspection and maintenance at pre-determined points. The system is mostly laid at the centre line of carriage ways to facilitate access and maintenance requirements.

The liquid waste is conveyed to three outlets situated at *Ras il-Hobz*, *Wied il-Mielah* and *San Blas* and at present waste is disposed of untreated. However there are plans to render the facilities at *Wied il-Mielah* and *San Blas* redundant and re-direct all the sewage in Gozo through a sewerage treatment plant which is envisaged to be located near the *Ras il-Hobz* outlet<sup>67</sup>. The *Ras il-Hobz* outlet has already been provided with an extended deep underwater outflow to render the problem of release of untreated sewerage into the sea less acute.

Apart from conveying domestic sewerage, the Gozo network is connected to commercial and industrial concerns. Furthermore, a number of animal farms are also known to be connected with this network.

<sup>66</sup> This fact was indicated during a meeting with an Enemalta official.

<sup>67</sup> This information is indicated in the Sewerage Master Plan for Malta and was confirmed during a meeting with officials from the Gozo Works Department.

In Comino, sewerage is generated from three main sources namely the pig farm, the Comino Hotel and the *Club Nautico*. It is mainly disposed of through discharge into the sea.

### 8.7.2 Sewage Treatment

By early year 2000, all sewage generated in Gozo was disposed of untreated into the sea. The situation is expected to change when sewerage generated in Gozo will all be directed through the *Ras il-Hobz* outlet via a sewerage treatment plant. The exact site location of the plant has still to be determined although it has already been established that it will lie in the vicinity of the *Ras il-Hobz* outlet. It has not yet been established whether treated water will be released into the sea or else it will be recycled to irrigate the agricultural area in the vicinity.

### 8.7.3 Coping with Demand

The amount of sewage generated is proportional to water consumed. Therefore, if water consumption increases, sewage demand would be expected to show a corresponding increase. A slight complication occurs when new buildings connect their roof surface runoff systems to the sewerage system. This leads to the overloading of the system with the result that manhole covers are blown off during periods of torrential rain with health hazard consequences. Problems also occur in coastal areas when malfunction occurs in pumps or during prolonged electricity cuts. Whilst the design of such pumps include a buffer tank to store sewage for the duration of the emergency, sometimes sewage has to be released in order to alleviate the problem. If this is released into the sea in summer, a health hazard occurs and a stretch of coastal area has to be closed off for bathing. Such instances also occur when leakages from underground pipes occur close to coastal areas.

Consultations with the Drainage Department in Gozo indicate that within the local plan period, apart from the construction of a sewer treatment station in the *Ras il-Hobz* area and the re-directioning of all the sewage in Gozo to this plant and continued improvements and maintenance of the existing network, no major interventions to the sewer system in Gozo are envisaged.

## 8.8 Solid Waste

### 8.8.1 Waste Generation

Like any other settlement, solid waste is generated as a by-product of human activity. The Waste Management Subject Plan for the Maltese Islands <sup>68</sup> classifies solid wastes into three main categories namely:

- a) Inert - which includes construction and demolition waste
- b) Non-hazardous - which includes municipal and Commercial/industrial waste
- c) Special waste - which includes port, airport, abattoir, healthcare and sewage sludge wastes.

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<sup>68</sup> Draft issue available from EMU and bearing the date of Feb 2000

In 1997, the bulk of solid waste generated in Gozo is 250,000 tonnes, which account for 95% of all the solid waste generated in Gozo. Based on these estimates, Gozo generates around 1/3 the construction waste in Malta but the figures have to be given due consideration since a high percentage of the construction waste generated on mainland Malta may end up dumped into the sea or is otherwise disposed of. No port or airport wastes are indicated as being generated in Gozo. Abattoir wastes are estimated to amount to 200 tonnes whilst healthcare wastes are estimated to amount to 125 tonnes. Twelve vehicle dumping areas are reported to exist in Gozo<sup>69</sup>.

### 8.8.2 Waste Collection

In Gozo, waste is normally collected on each working day and is transported by special vehicles to the *Xaghra* dump. At the present point in time, waste is collected at specific times so that the process does not entail undue obstruction to traffic and the unsightly waste collection vehicle is kept as much as possible out of view from tourists who visit Gozo. The specific waste collection times vary from council to council. The present system of collection is perceived as being quite efficient and operation is envisaged to be maintained on similar lines for the forthcoming years.

The areas which merit considerable attention are waste separation at source and recycling. These two activities could significantly reduce the waste load and operating costs associated with solid waste disposal. At the present point in time, there is not yet the culture to separate waste at home in appropriate containers where different categories of waste are segregated. It is also possible to recycle organic waste within households to subsequently use it as a fertiliser for better plant cultivation. Efforts aimed at the composting of domestic organic wastes are known to occur but are not perceived to be widespread in Gozo, even though a significant proportion of domestic dwellings enjoy a back garden.

### 8.8.3 Waste Disposal

Solid waste is disposed in two main ways in Gozo. Domestic waste is transferred from the urban areas to the tipping site at *Ghajj Damma* in *Xaghra*. Construction waste is supposed to be transported to specially designated sites and against a nominal fee, to be disposed of there.

The tipping site at *Ghajj Damma* presents many problems. Waste is often conducted to the site and simply tipped over the garbage vehicle. Although attempts at compacting waste do take place, these are not conducted according to European Standards and are often undertaken in an ad hoc manner. Moreover, construction wastes is often mingled with municipal waste and this adds to the bulk. The site itself lies on top of a promontory and is very conspicuous from various areas close to the northern coast of Gozo. The landfill is made even more conspicuous through the presence of smoke and unpleasant smells. The area is also known to be rat infested. It is therefore clear that the tipping site at *Ghajj Damma* presents a considerable land use problem and its close proximity to *Xaghra* and *Marsalforn* gives rise to many complaints. The landfill is also known to be nearing the limit of its holding capacity and therefore it is clear that this problem merits close and urgent consideration. A system of ecopods has been suggested for some time in the area but the indications are that the waste transfer station option is more desirable for Gozo. Whether the landfill should be located at *Ghajj Damma* or elsewhere is another problem. The

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<sup>69</sup> Based on info submitted by Dr. Ray Scerri, Ministry for Gozo.

landfill at *Ghajj Damma* is not strategically placed near the centre of gravity of Gozo's waste generation centres. It has been suggested that the site close to *Ta' Lambert* near the Gozo heliport would be more appropriate from a location point of view as it lies on the main thoroughfare between *Victoria* and *Mgarr* Harbour. However this site is problematic for other planning reasons. Apart from the fact that it is not ideal to have a waste processing facility close to the heliport as the helicopter over flies it, the site would also be frequented by waste collection vehicle movements. A site near the Gozo Experimental Farm, close to the route from *Rabat* to *Mgarr*, would be more appropriate but this matter will depend on the outcome of the Waste Management Subject Plan which is being developed. This latter site also satisfies the requirements set out in Structure Plan policy **PUT 16** which states that "*Sites will be identified at strategic locations in relation to the main areas of population, commerce and industry for the transfer or treatment of municipal, commercial and industrial inert/non-toxic waste.*" The

Site near the Gozo farm fully satisfies these criteria as it lies at the centre of gravity of the waste generation centres and close to the strategic *Rabat-Mgarr* link.

## 8.9 Security Infrastructure

Military infrastructure in Gozo and Comino are restricted to basically two areas. The main facilities are located at the base on the *Nadur* promontory at *il-Qortin ta' Isopu* and at the *Comino Tower*<sup>70</sup>. Most of the facilities are located within the *Qortin ta' Isopu* site where military training is undertaken and various activities related to the functions of the military are undertaken. The Armed Forces of Malta (AFM) have indicated that they would like to base the entire Gozo related military infrastructure at *il-Qortin ta' Isopu* and are seriously considering relinquishing their facilities at the *Comino Tower*. The AFM have also expressed the wish to control the issue of explosives from the *Qortin ta' Isopu* site, possibly through the construction of an underground storage depot. The *Qortin Ta' Isopu* will also incorporate a maritime radar station, storage facilities for the army's requirements, a helipad and a number of buildings to house staff and equipment.

The Civil Protection department has expressed interest in consolidating a fire station in the vicinity of the Gozo heliport at *Xewkija*. It has also expressed interest to have a small quay at *Marsalforn* in order to facilitate civil protection related duties on the northern coastal areas of Gozo. Interest has also been shown in the utilisation of a communications network, however this is envisaged to mostly use existing land-use resources.

The Police force operates throughout the territory on Gozo and Comino. Apart from the land use requirements associated with police stations, strategic land use issues such as vehicular circulation, areas prone to crime and general security are of concern to the police force. The police have expressed the wish to have more adequate facilities for the their Gozo premises, and premises to accommodate police and captured vehicles.

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<sup>70</sup> Most of the information in this paragraph is extracted from minutes of meeting with High Level Officials of the Armed Forces of Malta, the Civil Protection Department and The Malta Police Corps.

## 8.10 Policy Approach

### 8.10.1 Introduction

A good provision of utilities and services are essential to the well being of every community. Development can be stifled if there is not an adequate infrastructural supply and the requisite civic services are not provided. Although Gozo is a relatively small island, it is well provided for in terms of the main infrastructural services. The main problem is waste disposal as a definite solution to this long outstanding problem still has to be found.

The main objectives in the provision of services in Gozo is through the enhancement on the quality and reliability of the existing services in an environmentally friendly manner. It is important to note that the statement “*Cables Belonging to Maltacom, Melita Cable and Enemalta should be place underground*” in Public Attitudes Survey indicated a 90% agreement<sup>71</sup>.

### 8.10.2 Outline scenarios

Three main outline development scenarios can be envisaged for the islands of Gozo and Comino namely:

- a) **Do nothing option and continue to operate with current infrastructure.**
- b) **Invest in upgrading existing infrastructure to meet projected requirements.**
- c) **Radically change existing infrastructure through complete replacement.**

The scenarios could be applied to all the utilities and services indicated in **Chapter 8**. If option **a**) were to be pursued and no upgrading be undertaken, the current infrastructure will eventually prove to be inadequate in two ways namely:

- i) Networks fall into disrepair and cease to function properly.
- ii) Networks will not be able to keep pace with changing requirements and quality of service will deteriorate.

In option **b**), the rationale is to upgrade gradually, preferably through routes and facilities employed by the current networks. This option has the advantage of minimising disruption and spreading the cost of undertaking alterations over a period of time, thereby reducing capital expenditure shock. In order to be effective, all infrastructure service providers must collaborate between them in order to ensure that phasing of the respective upgrading is not disruptive on other services and to take into account any future interventions in the design<sup>72</sup>. Special attention needs to be given to maintenance and repairs in which case emphasis should be on minimisation of disruption and speed of execution without compromising other services. Local Councils must be closely involved in view of their local knowledge, their representative power and their duty to effect works within their locality.

<sup>71</sup> Public Attitudes Survey (Planning Authority – 2000) , Frequency Distributions –Gozo Local Plan, page 10.

<sup>72</sup> Various local councils and service providers have complained to the GCLP team that this lack of collaboration is translated into lack of efficiency and increased costs as the various parties run services contiguous to each other but do not take into account the respective needs.

Option c) is rather more radical in the sense that the existing services are totally replaced. Whilst this option may be desirable in certain respects, the implications in terms of cost and disruption would be very significant. However, in some instances it may be envisaged that total replacement of a particular network is phased over a period of time. For example, metal water pipes in a water distribution network may be gradually replaced by plastic ones but such programmes are normally implemented over a period of years.

### 8.10.3 Objectives and Strategy

In view of the options considered above, the following objectives should be addressed:

- Gradual improvement to upgrade infrastructural services network in an environmentally sensitive manner.
- Adoption of under-grounding of services where possible.
- Selection of an appropriate site for an electricity distribution centre for Gozo near *Xewkija*.
- Selection of a site for a sewage treatment plant at *Ras il-Hobz* and utilisation of treated water for agricultural irrigation.
- Upgrade sewerage network to reduce risk of overflows and consequent contamination of surroundings.
- Selection of an appropriate site for a waste transfer station near to the Rabat-Mgarr transport route.
- Study possibilities for converting existing *Xaghra* waste dump into a public recreational space.
- Reduction of the visual signature of antennae.
- Encourage conservation of energy through greater insulation of buildings and the use of more energy efficient equipment.
- Explore the possibility to utilise solar panels on the roofs of factories at *Xewkija* to supplement electrical energy requirements.

The general trend in the provision of utilities in Gozo is generally limited to maintenance and upgrading of the existing infrastructural network. Waste Management can be considered as an exception as in this instance there needs to be an overhaul of current “waste management” practices. The major services such as water, electricity, telephony, cable TV. and data networks (in general) will upgrade on the existing networks and provide better services in terms of quality and quantity. Given that no major expansion of settlements is envisaged for Gozo, no additional major land-use implications in terms of land occupation and visual impact is envisaged. The policy effort should be directed to integrate, where possible, the layout of services so that disruption to, or maintenance on, one network does not interfere with the provision on another. Policy effort should also be directed to the minimisation of visual intrusion through the careful positioning of wires along facades, the best visual siting of antennae, under-grounding of services where possible and to apply visual mitigation measures to structures especially when these have to be constructed in sensitive heritage areas or in the rural landscape. Projects for intervention should take into account Structure Plan policies **BEN 2, AHF 2, AHF 7, AHF 8, UCO 5, UCO 6, UCO 10, UCO 15, RCO 4, RCO 5**, and all the Public Utilities policies.

It is envisaged that major reforms are needed in recycling and the possibility of a waste transfer station is still open. The main candidate for siting the waste transfer station is the site at *Xaghra*. However, from a location point of view, this site is not ideal as it does not lie close to the axis linking the centre of gravity of waste generation (ie. near *Rabat*) and the *Mgarr* harbour. Other options earmarked for consideration included *Ta' Lambert* limits of *Xewkija*, a site near *It-Taflija* limits of *Xewkija*, and a site at *Tal-Imghajjen* limits of *Xewkija*. The *Ta' Lambert* site is appropriate from a location point of view. However there are problems with its proximity to the heliport. It is not ideal to have a waste transfer station near to a heliport with rubbish-laden trucks passing in front of the terminal building. Nor is it ideal to have a waste transfer station overflowed by aircraft taking off or landing near the airfield. Furthermore, the area near the current airfield has significant informal recreation potential. There are not many sites in Gozo which have similar recreational potential and therefore it is important to give the site its due consideration. A site at *Tal-Imghajjen* l/o *Xewkija* is considered to be the most appropriate site as it lies close to the *Rabat-Mgarr* route, is close to animal husbandry farms, lies away from inhabited areas and lies practically at the Centre of Gravity of solid waste collection centres in Gozo.

Special attention also needs to be given to ensure that the existing infrastructural services continue to operate under adverse foreseeable circumstances that can be reasonably envisaged and in the event that such reliability cannot be guaranteed, alternatives need to be provided. Given that utilities form the backbone of modern life on any stretch of territory, it is also important to undertake risk assessments so that large-scale disruptions for prolonged periods, as much as possible, do not occur. Provision of services in areas prone to natural disturbances (eg. landslides or flooding) should be as much as possible avoided and thus such and other risk prone areas need to be identified.

## 9. COMMERCE AND INDUSTRY

### 9.1 Introduction

A healthy economy is important to the development of any society and the Gozitan community is not an exception. Although the economy of Gozo is in many ways closely linked to the economy of the rest of Malta, there are aspects which make it quite distinct. The main differences can be attributed to the increased difficulty in accessing the national and international market centres (mainly attributed to double insularity), the limited labour supply, the limited economies of scale and the limited commercial and industrial space<sup>73</sup>.

Commerce in Gozo is mainly geared for servicing the island with its retail and services needs. There is a heavy orientation towards the servicing of the tourism sector. Although the market in Gozo is much more limited than that in Malta, it is well serviced in terms of the range of products and services available on the local market. There are also a number of concerns which have successfully penetrated the market in mainland Malta and others who even managed to export their products and/or services overseas.

Industry in Gozo can be divided into three main areas namely:

- (i) Garage industries and Small and Medium Enterprises (SME's)
- (ii) Manufacturing or assembly industry
- (iii) Construction related industry

The small and medium enterprises (SME's) are basically scattered all over the island with a significant concentration in *Rabat* and the larger settlements on the east of the island. They are generally geared to provide the community in Gozo with hardware and products which are needed on the island. They also cater for maintenance and repair requirements in Gozo. SME's normally employ ten persons or less.

The manufacturing or assembly industry normally requires larger space than SME's and often caters for needs outside the Gozo domestic market. These factories are mostly located at the Xewkija industrial estate.

The construction related industry is for the purpose of this study considered to include industry which caters for the requirements of buildings and structures till the completion of the structural framework. For the purpose of this report, it is classified in its own right due to the fact that it is normally much more land intensive than other industries, is usually located Outside Development Zones and is often obnoxious in nature. These industries are mostly geared for the Gozitan market. Construction related industries thus include the hard-stone and soft-stone quarries, batching plants, enterprises which supply concrete and concrete products, tarmac plants and concerns which supply structural elements such as steel beams.

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<sup>73</sup> These factors were also highlighted in a speech by the Hon. Minister Giovanna Debono During the Gozo Business Chamber Annual conference in March 2001.

## 9.2 Policy Context

The Structure Plan for the Maltese Islands 1990 considers commerce and industry in two policy chapters, one relating to commerce and industry and the other relating to minerals. Some of the policies relating to commerce and industry relate to both islands whilst a number are only relevant to mainland Malta.

The first relevant policy is **COM 5**, indicates that subject to the principle of good neighbourliness, the Planning Authority will give favourable consideration to the conversion of existing residential or other uses in built-up areas to small offices. This policy has been largely implemented, being especially evidenced in *Rabat* which has a good mix of commercial and residential areas. Conversely Policy **COM 8** indicates favourable consideration of planning proposals to convert vacated shop premises to other uses, again subject to the principle of good neighbourliness.

Industry related policies tend to be more site specific. For instance, Policy **IND 3** states that new industrial sites will be identified at *Xewkija* or/and at *Ghajnsielem*. It also designates part of the existing *Xewkija* industrial estates on the north-east side of the *Mgarr to Rabat* route for showrooms exceeding 500 sq.m. of customer floor space and retail warehouses. The extension to the *Xewkija* industrial estate has been implemented whilst the proposal to allocate part of the *Xewkija* industrial estate for showrooms exceeding 500 sq. m has also been partially implemented.

Policy **IND 4** is a general policy which indicates preference to higher density development which also allows for future expansion upwards rather than sideways as well as adequate for parking space. To date, this policy has only been marginally implemented in Gozo. **IND 6** on the other hand relates to the development of appropriate sites for service industry. There are no such designated sites in Gozo and service industry has developed in a rather ad hoc manner.

The local plan is indicated to designate areas for service industry. This is identified in policy **IND 6** which states that the Planning Authority will give favourable consideration to development of the service industry sites already identified under the Temporary Provisions schemes. No such designations have been made for Gozo. Policy **IND 7** states that incentives will be offered to assist the relocation of existing service industry activities which have an unacceptable environmental impact on the general areas in which they are located and on adjacent uses in particular. This policy does not elaborate on who should provide the funding of such incentives and who should manage such schemes and how. Policy **IND 8** is almost an iteration of policy **IND 4** in terms of emphasis on maximisation of land-use and the multi-storey approach to industrial development. The feasibility of utilising abandoned quarries for obnoxious industry is addressed in policy **IND 9** whilst policy **IND 10** is based on lines similar to **IND 7** and relates to the securing of relocation of obnoxious industry for environmental reasons.

## 9.3 Retail

### 9.3.1 Introduction

Retail space, together with office development, is concentrated in *Rabat*. In recent years there has been a substantial increase in shops in *Rabat*. The quality of recent developments is conducive to increased leisure shopping by visitors to Gozo and hence for job creation.

The Planning Authority carried out a Shopping Survey as part of the Commerce and Industry Subject Study. The fieldwork was carried out between November 1996 and January 1997 and the report published in November 1997. The purpose of the survey is to analyse shopping patterns so as to provide an information base for the development of retail policy. Three thousand five hundred households were interviewed, 500 of which were from Gozo. Seven localities were identified as Primary Retail Centres<sup>74</sup> i.e. centres with a regional rather than local catchment areas. This includes *Rabat* in Gozo. No secondary retail centres were identified in Gozo. This position has been reaffirmed by the Retail Study commissioned by the Planning Authority in the year 2000.

### 9.3.2 Food & Non-Food Shopping

A distinction is made in the results between non-food and food shopping. The following are a summary of what respondents who make use of *Rabat* said about this retail centre. The figures given in brackets are a numeric average of relevant percentages for the seven Primary Retail Centres.

#### Non-food shopping

- 45 per cent use their car to go to *Rabat* whereas a further 31 per cent use the bus.
- 29 per cent considered *Rabat* as being convenient. (national average is 17 per cent).
- 42 per cent mentioned no dislikes about *Rabat*. (national average. 31 per cent).
- 12 per cent noted lack of parking; a further 13 per cent the traffic congestion (national average 16 and 10 per cent respectively).

#### Food and Grocery Shopping

- 56 per cent of respondents who use *Rabat* centre to consider it as convenient. (national average 65 per cent)
- 80 per cent mentioned no dislikes (national average 71 per cent).
- 7 per cent noted the need for more parking. (national average 9 per cent).

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<sup>74</sup> For both non-food and food shopping

### 9.3.3 Retail Issues

Retail accounts for a substantial proportion of the economic activity in Gozo. It is mainly concentrated in *Rabat* with the main outlets lying near the main open spaces and the routes leading to these open spaces. Most of the retail activity takes place through relatively small outlets although a number of shopping complexes and mini-markets have emerged in recent years. A significant advantage of retail activity in *Rabat* lies in the fact that most of the commodities lie within walking distance of the bus stations that are situated along *Triq it-Tigrija*, *Triq ir-Repubblika*, *Triq Puturjal* and *Pjazza San Frangisk*. Most of the goods that can be found in Malta can also be found in *Rabat*.

In recent years, the pedestrianisation of the old part of *Rabat*, has resulted in a more pleasant retail environment in these older areas, making them more attractive to locals and visitors. The style of the shop fronts is generally more attractive than that of Maltese shops in most of the village cores. Probably, the implementation of shop front guidelines for Urban Conservation Areas has contributed to this improvement.

Land-use<sup>75</sup> indicates that in *Rabat* there is a relatively high proportion of retail floor space. Precise measurements are not available due to the complexity of the layouts in the older parts and the non-availability of the relevant statistics. The draft study on retail<sup>76</sup> in the Maltese Islands indicates the total sales area in Gozo of 20,000 sq. m. Given the problem of interpretation of the extent of the sales area and given that storage/display is considered as an intimate part of retail, it is more appropriate to consider global retail area. The land-use exercise indicates that the global retail related floor space in *Rabat* alone exceeds 50,000 square meters. This is quite a high figure for such a small community. Furthermore, the pressure to create more retail related premises does not seem to be abating. This issue has to be given some attention as over-provision of retail related facilities may result in a number of premises being under-utilised or even being (eventually) abandoned. There is also a risk that the larger commercial enterprises grow at the expense of the smaller traditional ones. This phenomenon, also evident in mainland Malta, will often deprive a settlement of the vitality and vibrance created by the smaller outlets, rendering the shopping experience more of an unavoidable “mechanised” experience rather than an interactive social activity.

Retail activity also generates significant numbers of traffic movements and a need for parking requirements. Parking and traffic movements are rather restricted in the older parts of *Rabat*, therefore people have to park their cars elsewhere. Whilst ideally, people should resort to public transport, at the moment this option is often not adopted as public transport in Gozo is very limited (See SECTION 6.1.2). Furthermore, the car gives more freedom, provides shelter in inclement weather and space for loading and unloading goods. Unfortunately, this comfort comes at a price. Congestion, pollution and parking problems have become chronic in *Rabat* and further degradation can hamper the development of economic activity.

<sup>75</sup> A detailed land-use exercise of land within development schemes was conducted by the Gozo and Comino Local Plan Team in early 2000.

<sup>76</sup> Draft Retail Topic Paper, commissioned by the Planning Authority in the year 2000.

## 9.4 Offices

Private offices in *Rabat* are mainly those related to the traditional professions such as architects, accountants, financial advisors, lawyers, notaries and so on. A very large proportion of private office space in Gozo is located in the centre of *Rabat*. This provides for a mix of activities in the centre of *Rabat*; a mix which supports its vitality. Efforts are being made for large firms to transfer specific office based activities to Gozo (for example data centres and parastatal organisations billing systems). This necessitates the provision of additional office space preferably in a central location. The proposals envisaged for the Gozo Communal Centre are envisaged to address a large proportion of this requirement. Other offices outside Gozo's capital are found at *Marsalforn*, *Xlendi* or *Mgarr* and are mainly related to tourism services. Detailed studies relating to office demand in Gozo are not available. However, judging from meetings with various public and private enterprises as well from demand indicated through planning applications, it does not appear that there is evidence of demand which cannot be met through existing (or envisaged) provisions within areas schemed for development. The demand for large enterprises locating their offices in Gozo to undertake back-office work cannot at the present point in time be quantified.

## 9.5 Manufacturing Industry

The manufacturing sector in Gozo can be subdivided in two main categories namely manufacturing which takes place on the *Xewkija* Industrial Estate (Gozo's only industrial estate) and manufacturing which takes place elsewhere. For the purpose of this report, enterprises which are located outside the *Xewkija* industrial estate are considered separately under the heading SME's (in **SECTION 9.6**). Of those employed, approximately 42% work in textiles, 18% per cent in furniture manufacturing, 16% in shoe manufacturing and 14% in food production. The remaining 10% persons are employed in tools, tiles and boat manufacturing<sup>77</sup> The *Xewkija* Industrial Estate employs around 850 persons and around 200 more are envisaged to be employed in the foreseeable future.

It should be noted that both the textiles and furniture industries have been undergoing declines and restructuring is required if they are to remain competitive in the long term. The textile sector has been undergoing substantial problems since the 1980's. Being highly labour intensive and dependent on low cost of labour inputs, it has sustained decreased competitiveness from higher labour costs especially during the periods of full employment. The furniture industry on the other hand has depended heavily on a protected local market. With 42% employed in textiles in Gozo and 18% in furniture (60% of total gainfully occupied in industry) it is quite evident that industrial jobs relating to high tech industry are rather lacking in Gozo<sup>78</sup>. Given Gozo's agricultural sector, food processing and production has good potential for further development. Small retail outlets and hand made crafts are also important contributors to the manufacturing sector in Gozo.

Due to its location, the island suffers from what it is termed as "double insularity"<sup>79</sup>. Transport costs and time combined with high wages make it much more difficult to compete in the market. A high proportion of the premises (factory facilities) offered by MDC have been leased to small and medium local industries through long-term lease contracts. This arrangement

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<sup>77</sup> Briguglio L., The Cultural Economic Impact of Economic Conditions in Gozo in Gozo and its Culture, Formatek 1995.

<sup>78</sup> Economic Survey Jan-Sept, 1997 pages 65-66.

<sup>79</sup> The implications have been indicated during a meeting with the Gozo Business Chamber.

can present difficulties with major industrialists trying to use under-utilised or vacated industrial premises. Major industries in Gozo include *Magro Foods*, *FXB*, *MP Clothing*, and so forth. Meetings with agencies responsible or related to industrial development<sup>80</sup> have not indicated a strong demand for additional land to accommodate further large-scale industrial development. However, the MDC did express the wish to retain the area due west of the *Magro Brothers* factory available for large-scale industrial development, even though at the present point in time, the likelihood of this area being utilised for such purpose seemed quite remote.

## 9.6 Small and Medium Enterprises (SME's)

Small and medium enterprises in Gozo are fairly widespread and include the so called garage industries. These enterprises play a very important role in servicing the economy of Gozo as well as in the generation of employment. SME's can be found within or near many of the established settlements but there is an increased concentration around the *Rabat to Mgarr* harbour route. Garage industries undertake a variety of activities ranging from woodwork to precise engineering. Most of these industries are found in small garages within residential dwellings. Known in Italian as '*casabottega*' (literally house-shop) such enterprises are common in many Mediterranean countries.

There is no statutory planning designation to accommodate garage industry in Gozo. The main difficulty in accommodating garage industries occurs when there is neighbour incompatibility. Not considering reasons of personal neighbour antagonism, the main objection to locating industry within residential areas can be summarised as follows:

- a) Generation of noise and/or vibration.
- b) Generation of particulates (eg. dust or smoke).
- c) Generation of obnoxious smells or poisonous gases.
- d) Generation of obnoxious waste.
- e) Storage or release of inflammable or explosive material.
- f) Generation of abnormal lighting conditions
- g) Release of abnormal radiation levels in any part of the electromagnetic spectrum.
- h) Creation of obstruction causing loss of amenity.
- i) Generation of unusually high levels of traffic, obstruction to parking or vehicular circulation.

In a number of circumstances, the negative impacts can be mitigated to a substantial degree either by careful management of operation or the introduction of devices which mitigate against adverse impacts. Time management is also important as some impacts can be tolerated during working hours but not during resting hours. If there are instances where the adverse impacts can be reduced to acceptable levels or even eliminated, then there is no reason why certain types of small industry cannot be accommodated within residential areas. In fact, certain types of industry such as bread furnaces (which operate at non-orthodox hours, create smoke and generate fairly high levels of activity) have been accepted to be integrated within residential areas. Some other

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<sup>80</sup> Refers to meetings undertaken by the Gozo and Comino Local Plan team with representatives from MDC and other agencies related to industry.

small industries such as certain carpenters have also traditionally been incorporated within residential areas.

Therefore it can be assumed that certain types of small garage industry can continue to operate within residential areas (provided that all measures are taken to ensure that negative impacts are mitigated) without causing undue neighbour incompatibility. Additionally there is the argument that non-industry related enterprises (such as take-aways, bars, restaurants, discotheques etc.) have traditionally been accepted within some residential communities. It must be recalled that these later concerns usually operate at fairly high noise levels during hours when the majority of the surrounding community is resting. These latter concerns also cause un-neighbourly activity caused by excessive traffic levels and noise.

There are some advantages in having certain types of small garage industry operate within residential areas. These include:

- a) Reduction of time to commute to work and hence less trip generation.
- b) Similarly, some customers may originate from the vicinity and hence may not need to use the car to reach the shop.
- c) Material, expertise and equipment may be found within a short radius if a network of such enterprises operate within a residential area.
- d) Such enterprises may use existing facilities within existing residential areas, thus maximising on land-use.
- e) Pressure on requests to create small or service industry zones in areas Outside Development Zones (ODZ) would be eased.

All the foregoing notwithstanding, there will still be enterprises which cannot be accommodated within the current residential areas, as their influence constitutes bad neighbourliness. This is especially true of the larger concerns which generate substantial activity. Therefore, it is important to take stock of the current situation so that land-use demand for small garage industry related activities are adequately addressed in the local plan.

A number of garage industries operating in urban areas are causing inconvenience to neighbours. Some of these have been operating without the requisite Planning permission. However a problem occurs as there are no alternatives in the sense that in Gozo, there are no designated sites for garage industries like there are in Malta. There are also no mechanisms to induce the private sector to lease or sell land to small garage industry operators. To complicate matters, the Malta Development Corporation (MDC) applied for planning permission to construct 17 small garages on two stories plus 4 *warehouses*<sup>81</sup>. The Planning Authority (PA) approved the proposal but subsequently there was a third party appeal and consequently these units remain<sup>82</sup> undeveloped. MDC has also applied to construct a small garage industry complex (129 industrial units of various sizes) at *Ta' Xhajma l'o Xaghra* near the racecourse<sup>83</sup>. There were environmental and planning problems with this application.

<sup>81</sup> PA 89/98

<sup>82</sup> Relates to early in the year 2001.

<sup>83</sup> PA6066/97

The Local Planning Unit in collaboration with the Ministry for Gozo conducted a survey to examine the current situation of the Garage industries as well as to understand their needs. A site for the location of SME's has also been identified but the demand needed to be quantified before commitments are made. Surveys on industry were subsequently upgraded through a study undertaken between the Local Planning Unit and the Strategic Planning Unit of the PA and MDC. This survey is being developed through studies that have been jointly commissioned by the PA and MDC to study further the industry situation in the Maltese Islands.

IPSE<sup>84</sup> has indicated various schemes through which incentives are offered to entrepreneurs in order to formulate business plans, to enable the gradual implementation of business plans and to give general support to small enterprises. IPSE has also indicated the need for business incubation centres<sup>85</sup> on Malta and that the idea of having one on Gozo merited further study. Business incubation centres are intended to provide common administrative services for entrepreneurs who are starting their business. The idea is also to have budding enterprises on a designated site. Once these enterprises grow and mature, they would be encouraged to locate in more appropriate areas. IPSE has also indicated the need to focus more on external markets and to operate more efficiently.

## 9.7 Construction related industry

### 9.7.1 Introduction

Construction related industry deserves special consideration for a number of reasons. First, it is usually based in non-urban areas and outside industrial estates (or other areas earmarked for industry). Hence there are special implications and impacts on the rural landscape. Secondly, it is usually associated with the extraction of mineral resources and thirdly it is normally obnoxious, especially through the generation of copious amounts of dust as well as noise and vibration. Therefore, besides being normally incompatible with residential and other urban uses, construction related industry is also usually proximally incompatible with other types of industry. Additionally, the location of extractive industry is often determined by the location of the relevant mineral deposits or the transport network leading to the mineral extraction sites.

In Gozo, there are two basic types of construction related industry. The first type relates to extractive industry whereby the mineral is extracted from the ground. The second type of industry relates to the initial processing of the extracted minerals (eg. crushing, batching, tarmac making etc.).

### 9.7.2 Extractive Industries

There are two main types of extractive industries in Gozo, namely hard stone and soft stone quarrying. Both types of quarrying employ open-cast methods. Hard stone quarrying usually employs explosives and less frequently ripping or percussion machinery. In soft stone quarrying, standard size rectangular blocks are normally extracted by electric circular saws. In both cases, the extracted products are normally temporarily stored on site before being transported away.

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<sup>84</sup> Institute for the Promotion of Small Enterprises.

<sup>85</sup> The first business incubation centre in Malta was inaugurated at Kordin industrial Estate on 17/05/01

There are 3 operational hard stone quarrying sites in Gozo<sup>86</sup> namely:

- Quarry G5 - *Il-Mixta* /o *Kercem*
- Quarry G7 - *Qortin ta' Isopu* /o *Nadur* (to be replaced by new permit at *Ta' Klement*)
- Quarry G10- *Ghar id-Dar* /o *Qala*

Additionally, there are a number of sites which have ceased operations. (Eg. Quarry at *Ghar Ilma*)

Hard-stone quarries in Gozo cover an area of 113,604 m<sup>2</sup> or 0.17% of the total land area of Gozo<sup>87</sup>. In contrast to Malta and by virtue of their location, hard-stone quarries in Gozo are generally not very conspicuous from long distance views on land. However, the *Ghar id-Dar* quarries are very visible when viewed from the sea or from the immediate neighbouring area.

On the other hand, soft-stone quarries in Gozo tend to be very problematic from a landscape point of view because they are girdled around a basin which is an environmentally very sensitive site (*Qawra/Dwejra*). These quarries are imparting a very negative visual impact which is seriously degrading the otherwise high landscape value of the area. Although it is appreciated that mineral extractive industries can only take place where the relevant minerals exist, current operations do not employ visual mitigation measures to minimise adverse visual impact to the lowest possible extent. Nor is the extent of the quarries adequately controlled to the extent that further sprawl towards the sensitive areas is checked.

Soft-stone quarries in Gozo cover an area of 284,561 m<sup>2</sup> or 0.44%<sup>88</sup> of the total surface area of Gozo. Although numerically and percentage wise the figures are not very significant, in terms of visual impact, the soft stone quarries represent a formidable problem in Gozo. It is quite difficult to screen an existing operational quarry which is located on a slope. However, once operations cease, it should be quite possible to reclaim the quarry with inert waste and create terraced agricultural land that maintains the previous visual continuity. In the meantime, the main mitigation measures should include limitation to the generation of dust, the creation of suitable earthworks and the terracing of the quarry profile. Similar profiling techniques have been indicated in the Minerals Subject Plan for the Maltese Islands.

### 9.7.3 Other Construction related Industries

In Gozo, there are a number of construction related plants. These are mainly batching plants and tarmac plants. There are 4 batching plants and 2 tarmac plants in Gozo<sup>89</sup>. Some processing of mineral material takes place within the quarries themselves. Otherwise batching plants tend to occur as structures in the middle of open countryside. Thus they appear rather unsightly. Furthermore, there have been few attempts to screen the more obnoxious activities from view. The industrial activities also tend to generate considerable quantities of dust. These appear to originate from four sources namely from handling of rock material, machinery generating dust

<sup>86</sup> Minerals Subject Plan for the Maltese Islands, First Draft report, 2<sup>nd</sup>. September 1999, Entec UK Ltd.

<sup>87</sup> Figures relate to 1999.

<sup>88</sup> Data supplied by Minerals section, Environmental Management Unit, PA.

<sup>89</sup> Data obtained by the PA from the VAT department re. year 1999.

powder, wind blowing dust off stacked crushed rock piles and dust raised by vehicular movements. The resulting dust tends to smother surrounding cultivated land and vegetation.

At the present point in time, there is a strategic level policy gap to guide development of construction related industry. However, there are other parameters which can be used to locate such development. For example, by virtue of their bad neighbourliness, construction related plant is located away from inhabited areas. In the absence of specific areas earmarked for such development, the choice of the site is rather arbitrary. Most of the construction related plant in Gozo occupies previous agricultural land. Some lie in areas of considerable scenic value. There is no evidence of demand for additional batching plants in Gozo.

## 9.8 Policy Approach

### 9.8.1 Introduction

Commerce and industry are important elements of the Gozo economy. Such land-use can create conflict due to the small size of the island. As stated before, the Gozo economy is based on two main sectors, namely tourism and agriculture. Both tourism and agricultural sectors have to be protected while at the same time industrial sector has to be enhanced and improved. Job creation is important for Gozo and the Ministry's (for Gozo) direction is towards the back office sector. The Ministry has already embarked on a programme to transfer services from Malta or overseas. Private initiative seems to begin to appreciate the benefits of back-office work. An application has already been filed to convert a residential house in *Triq Ir-Repubblika* to a financial centre/offices development for such purposes. One can conclude that although Gozo is smaller than Malta, human resources at a professional level are not lacking and ratio wise Gozo has more professionals than Malta<sup>90</sup>. The challenge is to provide work for these professionals on the island, hence improving the quality of life and creating an economy based on more substantive and sustainable foundations. The way forward is back office services: it is not land intensive and is relatively environmental friendly.

### 9.8.2 Scenarios

There are basically three outline scenarios that can be envisaged to develop within the Local Plan horizon.

a) **No change to existing situation**

**IMPLICATIONS** : Demand for commercial and industrial development continues to be satisfied within existing or committed areas. Given the limited commercial activity, investment to improve the quality of the existing development is not deemed likely.

b) **Demand for Commercial and Industrial activity increases significantly**

**IMPLICATIONS** : If this scenario materialises, then additional tracts of land outside existing industrial areas would be required. Given that most form of commercial and industrial development is not visually compatible with scenic rural landscapes, there is a good likelihood that commercial and industrial development is undertaken at the expense of agriculture and tourism. Even with well-designed mitigation measures, the impact

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<sup>90</sup> This statement can be inferred from demographic statistics relating to educational background.

could still be significant. This is especially true of industrial development where the facilities needed are often on a large scale and massive, where potential pollution problems are more likely to occur and where visual mitigation measures are more difficult to apply. Moreover, the double insularity problem will still represent a problem and this would undoubtedly affect competitiveness, especially if the relevant industry involves the haulage of heavy and bulky goods. A significant increase in construction industry will almost invariably result in further destruction of the Gozitan countryside, rendering the island less appealing to inhabitants and visitors. This has direct and indirect socio-economic repercussions.

If the increase in commercial activity is limited to high value-added concerns, which take up relatively little land and which can be accommodated within existing areas earmarked for urban development, then provided that the infrastructure could provide the requisite demands, these firms may well operate without great difficulty. The availability of IT technology could be of great assistance in this respect. Some service related concerns might be left to operate in existing residential areas if sufficient mitigation measures are implemented to ensure an acceptable degree of neighbour compatibility. The envisaged Gozo Communal Centre, with its fairly generous provision of floor space, could prove to be an opportunity in this respect.

If retail facilities expand significantly in Gozo, there could be serious planning repercussion. Given that the existing vehicular thoroughfares are not envisaged to change much during the local plan period, increases in vehicular activity could very well clog the very network intended to ease the movement of people and goods. Furthermore, given that resident and visitor populations are not envisaged to increase significantly, it is rather unlikely that a significant increase in retail outlet provision would be economically sustainable. The end result may well be a glut of retail and commercial buildings, many of which would no longer be undertaking commercial activity.

- c) **Demand for commercial and industrial activity increases but not to the extent that it requires substantial tracts of land outside that currently designated for industrial activity.**

**IMPLICATIONS** : This option is the most desirable as it represent better utilisation of land, opportunities for imaginative design and greater possibilities for limiting intra and inter settlement commuting. It is not easy to intervene within a pre-existing settlement as the existing surrounding buildings and infrastructure could present significant operational constraints. However, there may be contextual and other proximity advantages which offset the indicated challenges, thus encouraging entrepreneurs with foresight to operate in this manner.

In areas ODZ, existing industrial and commercial concerns would be limited to their current extent and any envisaged intensification would be guided to actively seek to limit activities within the existing precincts whilst undertaking the necessary visual mitigation measures.

From a planning point of view, option **9.8.2 c)** is the most desirable as it allows for expansion of commercial activity whilst maximising on the utilisation of land (and this is compatible with the SP's main goals).

### 9.8.3 Objectives and Strategy

In line with SP goals, objectives and policies, it is desirable to provide the necessary infrastructure to allow for the growth in commerce and industry. However, and especially in Gozo (which is a Rural Conservation Area), special attention needs to be given to the environmental implications of such development. There is therefore a delicate balance between provision of the requisite framework for continued economic development on Gozo and the obligation to safeguard Gozo's natural and cultural heritage.

The strategy should therefore seek to address the following objectives:

- Provision of sufficient land within areas indicated for development, to cater for the envisaged retail needs till at least the year 2010.
- Provision of the requisite infrastructure to support development in commerce and industry within existing areas indicated for development. Infrastructure shall also be taken to include embellishment measures, especially those earmarked at the town-centre.
- Steer (appropriate types) of commercial development towards the centre of the settlements and especially along areas earmarked around the route linking *Rabat* with *Mgarr Harbour*. (Smaller traditional convenience goods should be directed towards the historic areas whilst larger convenience shopping should be located within the town centre or neighbourhood centres. Larger enterprises should be located near the periphery of the town centre where there are appropriate facilities for vehicular circulation).
- Promote more pedestrian commercial areas in the vicinity of public car parks to encourage social interaction and to introduce additional vitality into such centres.
- Ensure that commercial development in the more sensitive areas (eg. *Rabat* historic centre, UCA's) respect their sensitive surroundings and that shop designs reflect the sensitive nature of their context.
- Encourage neighbour compatible leisure activities that promote commercial activity after office hours.
- Ensure that warehousing is located away from the congested areas or narrow carriageways. Preferably, these should be located near industrial areas or in specially located areas near the *Rabat / Mgarr* route.
- Encourage the retention of Small and Medium Enterprises (SME's) within existing areas earmarked for development. (Should reasonable neighbour compatibility problems be encountered, the first attempt should be to try and mitigate or eliminate the inconvenience through appropriate measures. If this approach does not yield satisfactory results, relocation to an appropriate earmarked area shall be considered.)
- Identify suitable areas for warehousing which by virtue of its operation and/or scale, cannot be accommodated within existing areas earmarked for development.
- Earmark the area due west to the existing Xewkija industrial Estate for the eventuality of future expansion. Other large areas designated for industrial development shall not be permitted.

- Encourage the introduction of incentives towards fuller and better utilisation of private industrial land.
- Identify a site of suitable dimensions and lying as close as possible to the main route between Victoria and Mgarr to accommodate SME's. (A development brief should subsequently be drawn up for such a site.)
- Promote studies to investigate the feasibility of a Business Incubation Centre in Gozo, preferably within or close to areas indicated for SME's.
- Designate areas suitable for hard and soft quarrying based on the findings of the minerals subject study.
- Indicate mitigation guidelines for permitted obnoxious development in the countryside. These should ultimately lead the way for formally approved detailed guidelines.

# 10. TOURISM & RECREATION

## 10.1 Introduction

In the modern world, recreation is recognised as an important constituent of a good quality of life. Tourism is a particular form of recreation and therefore one of the “vents” needed to relieve the stress induced through hectic lifestyles. Tourism can also be defined as “the temporary short-term movement of people to destinations outside the places where they normally live and work and the activities during their stay at these destinations”<sup>91</sup>. Both tourism and recreation have achieved such predominance that they have become leading global industries. One of the main pilasters of Maltese Islands’ economy is in fact based on tourism. Like all other human activities, tourism and recreation impose land-use requirements. Pressure on the use of land is invariably generated by tourism related activities. Facilities for accommodation, translocation and recreation all have spatial consequences. Location, scale and environmental impacts constitute some of the main planning concerns.

The islands of Gozo and Comino play an important role in the tourism and recreational strategy for the Maltese Islands. These smaller islands offer a complementary destination to mainland Malta as well as providing a local (Maltese) tourism venue. Gozo has two main type of tourism. Domestic and foreign visitors for holiday and recreation purposes predominate whilst only a small percentage is business tourism. On the other hand, tourism generates local employment and supports local jobs and services.

Although as indicated, tourism is a special form of recreation, the subject is given distinctive attention in the first part of this chapter (**Sections 10.1 to 10.3**) in view of its specific requirements. Other forms of recreation indicate those activities which contribute to recreation for the populations of the germane locality (including sports) and informal recreation. The implications of tourism and recreation related development on their surroundings merit particular attention because these are generally located in sensitive contexts. Altering such contexts may in the long run destroy the very features that brought tourism related development to a particular location in the first place. It is widely acknowledged that tourism relies heavily on the condition of the natural and cultural environment. Sustainable development is based on the premise that economic growth should not be undertaken at the expense of conservation of the environment. Sensitive development may enhance upon a previous landscape and therefore promote additional prosperity. The irony with tourism and recreation related development is that often, the success of a few ventures encourages considerable pressures which eventually induce over-development ... a phenomenon which planning must seek to address.

## 10.2 Tourism

### 10.2.1 Policy Context

The Structure Plan for the Maltese Islands (SP) indicates a number of policies intended to steer tourism related development. The general emphasis is on the development of existing under-

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<sup>91</sup> Condensed from the introduction of the Tourism Topic Study – Consultation Draft – June 2000.

utilised cultural assets, upgrading of existing tourism related facilities and integrating a good quality of the environment with the promotion of tourism. The SP emphasises in policy **TOU 1** that there is a need for a joint Tourism Development Committee with the Secretariat for Tourism and other relevant bodies for integrating tourism development policies and programmes at a strategic and local level. In 1999, the Malta Tourism Authority was established and during the same year, the Gozo Tourism Association was also established.

*Fort Chambray* is indicated in policy **TOU 6** as an area which has a potential for tourism accommodation and tourism facilities. Given that a development brief was issued and a permit was awarded for development on Fort Chambray, the provisions of this policy have been fulfilled. Construction work is currently<sup>92</sup> at an advanced stage.

Encouraging tourist development in the form of conversion, extension, and refurbishment of existing buildings and facilities in Urban Conservation Areas (UCAs) is identified in policy **TOU 9**. Some development to this effect has taken place in Gozo with the conversion of a number of houses of character which were rehabilitated to accommodate expatriates.

The SP policy **TOU 10** *Ta' Cenc* area, from east of the *Mgarr ix-Xini* inlet to the village of *Sannat*, is proposed Malta's first multi-ownership tourism hotel development, in the vicinity of the existing *Ta' Cenc* hotel. The area has also been identified as a National Park. (see **Chapter 14** re. incorrect use of the terminology "National Park" in the local context). Discussions on proposals for *Ta' Cenc* were still being undertaken in mid-year 2000.

The SP in policy **TOU 11** stresses that the government will seek the co-operation of relevant public and private sector agencies to ensure that the Islands' many heritage items are made more accessible and interesting to tourists. Heritage trails are also indicated to be identified in Local Plans. Co-operation between Government and the private sector has mainly occurred on an ad hoc basis but an increase in such co-operation is perceived (eg. at *Ta' Cenc*, *Chambray* etc.) Proposals for heritage trails were shown to Local Councils<sup>93</sup> for their perusal by the Gozo and Comino Planning team during their meetings with the local councils.

## 10.2.2 International and Domestic Tourism

Gozo has two main types of tourism. One sector comprises local tourism which is composed of people from mainland Malta who visit Gozo especially during weekends, periods when public holidays occur close to weekends and in summer. The other sector is composed of ex-patriates that dedicate one or more days of their stay in the Maltese Islands to visit Gozo. Day-trippers, especially overseas ones, do not make a considerable economic contribution.

In 1993, the National Tourism Organisation carried out sample surveys on tourists visiting the Maltese Islands in the spring, British, German and Dutch tourists were surveyed. Most tourists to Malta have visited Gozo with some 10 to 13 per cent of the total staying for at least one night. **TABLE 10.1** indicates the percentage distribution of spring tourists to the Maltese Islands in 1993.

<sup>92</sup> Currently refers to mid year 2000.

<sup>93</sup> Draft maps indicating heritage trails were presented for feedback to the various Local Councils by the Gozo and Comino Local Plan team.

**TABLE 10.1**

**VISITS TO GOZO**  
**PERCENTAGE DISTRIBUTION OF SPRING TOURISTS TO THE MALTESE ISLANDS BY**  
**NATIONALITY , 1993**

TYPE OF HOLIDAY	British	German	Dutch
Gozo only holiday	4	5	8
Overnight stay in Gozo	6	8	3
Day Trip to Gozo	63	71	70
No visit to Gozo	27	16	19
<b>Total</b>	<b>100</b>	<b>100</b>	<b>100</b>

Source - Market Profiles - Spring 1993 - NTOM

**TABLE 10.2**

**VISITS TO GOZO**  
**INTERNATIONAL TOURIST ARRIVALS TO GOZO ACCORDING TO MAIN MARKETS**  
**(1998)**

	British	German	Italian	French	Dutch	Swiss	Austrian	Belgian	Sub-total	Total Malta
International Tourist Arrivals to Malta	449 (38%)	204 (17%)	91 (8%)	72 (6%)	57 (5%)	25 (2%)	24 (2%)	25 (2%)	947 (80%)	1182 (100%)
<b>VISITS TO GOZO</b>										
Excursion Only	319	142	63	60	40	16	17	18	675	
Excursion + Overnight Stay	9	4	10	2	1	1	1	0	28	
Gozo Only Holiday	13	12	5	1	2	2	2	2	39	
Not Visit	108	46	13	9	14	6	4	5	205	

Source – Gozo Tourism – GTA Table 3.a, July 2000 – (NOTE all figures in '000 of visitors)

**Table 10.1** and **Table 10.2** both indicate that trends for day visits in Gozo remain more predominant than longer stays, irrespective of nationality. The British tourists represented the largest visitor group in 1998, followed by German and Italian visitors respectively. More significantly, around two-thirds of visitors to the Maltese Islands, visit Gozo but only around 10% resort to overnight stay. During 1996, hotels in Gozo hosted 54,000 visitors. Of these, 65% were expatriates whilst the rest (ie. 35%) were of Maltese nationality. The average length of stay was 4.2 and 1.6 nights for foreign and Maltese visitors respectively. Eighty-one per cent of Maltese visiting Gozo had stayed overnight. The length of stays generally varies from 2 to 7 days. Ten percent of the respondents indicated that they make use of hotel accommodation whilst 49% use

rented flats or apartments. Nine percent stayed with relatives and 5 per cent used farmhouses/villas.

Gozo is a seasonal destination with most hotels closing down during the winter season. There is a heavy reliance on part-time employment. In 1996, Gozo and Comino had 17 tourism accommodation establishments (hotels/ tourist complexes/ guesthouses) with 1,310 beds. In 2000, the number of accommodation establishments have risen to 19 and the number of beds estimated at more than 1,500. In 1996, 60% of the beds were in 4 or 5 star hotels: in the year 2000, this figures is estimated to have risen to around 70%<sup>94</sup>. A further two hotels (*Chambray* and *San Lawrenz*) were constructed in the late 1990's with the *San Lawrenz* hotel having become operational. In 1997, there were 108 catering establishments. In 1999, the number of catering establishments is indicated as having decreased slightly to 106<sup>95</sup>...a change which can be considered to be insignificant. Hotels and catering establishments provided for around 750 full-time jobs or 7 per cent of the total work force.<sup>96</sup> A further 1,525 beds licensed as self-catering units, (including farmhouses),<sup>97</sup> were indicated in 1997. These have increased to 2,040<sup>98</sup> beds in the year 2000. There are indications of an unspecified number of unregistered self-catering beds. It is important to note that in the year 2000, the self-catering sector accounted for almost 58% of the beds in Gozo and 45% of the bed-nights. A large number of holiday apartments were also rented out to Maltese. In recent years, more Maltese are staying overnight in Gozo, mostly in apartments. This generates good income to Gozitan catering and entertainment establishments.

The occupancy rates of foreign tourists in 4 and 5 star hotels was about 29 % cent in the first six months on 1996.<sup>99</sup> This was less than the corresponding rate of similar establishments in Malta. In the year 2000, the annual occupancy of hotels and guesthouses were 34%.<sup>100</sup> There are no operational hotels in *Rabat* or the adjoining urban areas. Several Gozitans contend that Gozo can be considered as a destination in its own right and therefor a marketing strategy separate to Malta would be more effective. There may also be a case for a marketing strategy addressing the domestic market for winter breaks.

### 10.2.3 Day Visits

Day-trippers on coach tours constitute a high proportion of visitors to Gozo. The economic benefits to Gozo for each day-tripper is very limited with a small percentage of the tour price going into the Gozitan economy (to cover the coach and lunch expenses). These tours are not dedicating sufficient time to the display of Gozo's historical and architectural heritage and the beauty of its landscape. Day tours could be an excellent marketing tool to encourage return overnight stays but this potential is not being fully utilised.

<sup>94</sup> Gozo Tourism - (report for GTA by Stevens and Associates), JULY 2000, Table 1.

<sup>95</sup> Gozo Tourism - (report for GTA by Stevens and Associates), JULY 2000, Table 11.

<sup>96</sup> Prospects for Development: the Gozitan Perspective, address by the Hon. Dr. Anton Refalo., during presentation in Bank of Valletta Gozo Conference, Tourism a Pillar of Sustainable Development in Gozo, 1997

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<sup>98</sup> Gozo Tourism - (report for GTA by Stevens and Associates), JULY 2000, Table 1.

<sup>99</sup> Address by the , Dr. Alfred Sant , in address during the Bank of Valletta Gozo Conference, Tourism a Pillar of Sustainable Development in Gozo, 1997

<sup>100</sup> Gozo Tourism - (report for GTA by Stevens and Associates), JULY 2000, Table 1.

The Tourism & Recreation Survey indicates that around 19% of Maltese who related that they visited Gozo, had done so on a day trip and mainly use of their own car.

#### 10.2.4 Retirement Tourism

Another form of tourism is retirement tourism whereby foreigners (and returned migrants) retire in Gozo. This generates demands for services and hence income and employment. Because of the longer time spent on the island, the economic benefits derived from one overseas settler is equivalent to several tourists coming to the Island. Expenditure is also throughout the year rather than at peak periods. Gozo has a better potential than Malta for this form of tourism because of its natural environment.

Dwelling figures for Gozo reveal that is a very high vacancy rate in Gozo (see **Chapters 3-5**) and also that the rate of supply of new units surpasses demand from the formation of new households. Some of the surplus dwellings would be put to good economic use if they provide accommodation for retired migrants or expatriates.

The acquisition of the property, by Maltese or foreigners, provides an influx of finance into the Gozo economy; such benefit is mostly lost if and when the property is sold back to Gozitans. Acquisition of property also generates demands for service related to house furnishing and maintenance. Money is also spent during visits on catering, entertainment and so on. Many of these properties remain vacant for long periods during the year resulting in under-utilised infrastructure and reduced vitality of towns and villages.

One should not confuse the acquisition of property by foreigners (for which an AIP (Acquisition of Immovable Property) permit is required with overseas people retiring in Gozo (or Malta). One does not necessarily imply the other. There are several overseas visitors who have bought property in Gozo and who visit the Island once every one or two years. Some also rent the property to compatriots or lend it to friends. At the moment<sup>101</sup>, the capital gains tax plus an additional 10% tax on acquisition by foreigners constrains such transactions and prevents acquisition by foreigners for speculative purposes. (Also refer to **Chapter 2** re. property acquisition by foreigners).

From feedback received from consultation it appears that many foreigners would consider settling in Gozo much more favourably than in Malta because Gozo is still largely unspoilt by over-development. There is a case for marketing Gozo specifically for retirement tourism and consider rebates on property acquisition tax against guarantees that the buyer will actually settle in Gozo.

Enhancing Gozo's role in its relative product mix, Gozo offers the country its main opportunity to create a quality resort and attract a higher spending and differing type of tourist.

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<sup>101</sup> Refers to late in the year 2000.

## 10.3 Tourism Policy Approach

### 10.3.1 Objectives and Strategy

The Tourism industry in the Maltese Islands has to a large extent been based on marketing the sun, sea and sand. The Maltese Islands have much to offer in terms of history, mystique and Mediterranean heritage. However, this latter potential has only recently been marketed. Tourism constitutes one of the mainstays of the Gozitan economy and hence it should be given its due importance. The prevailing view of investing resources in hotel facilities is known to be generally limited and short-sighted. The stay of the visitor is not normally limited to a hotel or tourism related complex. An average visitor likes to explore a new country with a view of benefiting from a different context and interacting with the culture. Furthermore, hotel windows offer views of the surrounding landscape. Therefore investing in accommodation facilities without investing in the surrounding countryside is only a partial investment. The objectives for tourism planning policy approach are indicated to:

- Promote the enhancement and upgrade of existing tourism facilities.
- Encourage the marketing of Gozo as a cultural heritage destination.
- Encourage the promotion of Gozo as a special rural holiday destination.
- Discourage additional development of tourism related facilities in rural areas.
- Promote the conversion of existing dilapidated buildings in Urban Conservation areas for tourism use.
- Discourage further uncontrolled growth of tasteless apartments on Gozo ridges, near popular bays or in other sensitive locations.
- Discourage further low quality amenities which cater for day visitor mass tourism.

The main thrust of a planning strategy for Gozo should focus on providing a destination which has a competitive edge on other destinations. The main strengths of Gozo and Comino as a destination include a rural atmosphere set in a distinctive landscape with an equitable climate. Residence in Gozo can be considered as safe, the population is friendly and culture oozes from every corner. English is widely spoken and access to shopping and communication facilities can be considered as good. Therefore, it makes sense to capitalise on those qualities which are not easily found elsewhere and to market them in such a manner as to encourage tourists which visit the islands all year round, leaving enough revenue to propel the economy in Gozo.

Copying short-term “successful” ventures in other areas of the Mediterranean or in mainland Malta, often leaves detrimental results. Short-term financial gains have often, in the long term proven to be unsuccessful. Examples of large-scale speculation in other parts of the world indicate that if a tourist area is overdeveloped, it will no longer be desirable for tourists to visit. Gozo can be considered fortunate in the sense that it is still in time to learn from mistakes that have occurred elsewhere.

General upgrading and improvement of Gozo and Comino help to attract high quality tourists. Although facilities such as hotels, restaurants, farmhouses, entertainment and sports facilities are requisite forms of development which complement a flourishing tourist industry, these should not be developed at the expense of natural and cultural heritage. Furthermore, given the scale of the economy of Gozo, it is imperative that the relative market shares are economically sustainable,

otherwise the islands become dotted with quite a number of under-utilised or redundant facilities. To date, a fair number of such redundant facilities have been identified in various localities<sup>102</sup>.

The future for tourism development in Gozo and Comino can be quite bright. If the importance of the distinctive qualities of the islands are recognised and appreciated, there is a greater likelihood of contained and sensitive development taking place.

## 10.4 Recreation

### 10.4.1 Background

As well as having a valuable social and economical role, sport and recreation are important components of civilised life. Demand is concentrated mainly in the urban areas and it is mostly there that easy access to children and elderly is provided; therefore contributing to the quality of the urban life.

Gozo is a small island with a relatively high population density and limited access to recreational facilities due to the simple fact of a very limited public transport system. Most of the recreation takes place outside urban areas in winter whilst in summer recreation normally takes places near the sea especially places such as *Marsalforn* bay and *Xlendi* bay.

Eighty-eight percent of the island of Gozo is open countryside but public open spaces and access lack on the island due to the fact that the majority of the land is privately owned. Still a large proportion of recreation that takes place on the island is informal and environmental friendly.

Most of the informal recreational facilities and activities are provided by government and voluntary organisations. The island offers a variety of recreational opportunities varying from cultural heritage, countryside, playing fields, sports (including diving) and swimming.

### 10.4.2 Policy Context

Recreation is identified as an important component of strategic planning the Structure Plan (SP) for the Maltese Islands, 1990. The SP also identifies the Local Plan as instruments to define sites for the provision of recreational facilities (**REC 1**).

Sites for district level recreation centres where a range of facilities can be accumulated and managed effectively (**REC 4**) are indicated to be identified in the Local Plan while the Planning Authority is envisaged to assist in assembling land and to co-ordinate publicly provided facilities with commercial and voluntary aided facilities.

In relation to **REC 5**, the SP identifies that in *Rabat* there should be provision for professional sports facility management and international standard coaching on a National level. The part use of facilities for sports tourism with linked hotel or apartment accommodation is encouraged. This policy has already been satisfied by the building of the Gozo Sports Complex and international activities already taking place in this complex (Small Nation Games 1990).

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<sup>102</sup> These have been observed through various site visits and the land-use survey and have been informally confirmed through a number of sources.

Provision for sports and recreational uses on a district level in the countryside is to be made in the Local Plan while taking special care in minimising adverse environmental impacts. These include facilities for major impact sports (these are subject to an EIA). Once the Local Plan designates such locations, any other location will be specifically prohibited.

Identifying and establishing a network of country parkways and coastal and inland rights of ways for footpaths, cycle routes, and horse riding trails in a circular route while linking to natural or man made attraction and facilities is highlighted in policy **REC 13**. This policy identifies specific locations to be linked in Gozo and are:

- a) Northwest coast linking *Marsalforn* and *Dwejra Bay*
- b) West coast at *Qawra Tower (Dwejra Bay)* along *Wied Ilma* inland to *Santa Lucija/Kercem*.
- c) From *Mgarr* eastward along the coast to *Wardija* off *Qala*, and west to *Mgarr ix-Xini* and along *Wied Hanzira*.

A report has already been drafted and distributed for consultation to the Minister for Gozo and the local councils in Gozo. Draft identified routes compiled by the Local Plan team have been forwarded to Local Councils for their feedback.

#### 10.4.3 Formal Recreation

Sport plays an important role in recreation and nearly all the Local Councils have a team that participates in the Gozo Football Association (GFA) league. This offers the local people with football matches taking place at the Gozo Stadium during the weekends. During 1999, the number of football matches were reduced to accommodate the Gozo Football Club in the Premier League played in Malta. A meeting with the Gozo football association president has indicated a requirement to have a smaller nursery developed adjacent to the main football ground (due north) so that football in Gozo could develop along more modern lines<sup>103</sup>.

The Gozo Sports Complex caters for a variety of sports that takes place on the island. These are tennis, badminton, basketball, squash, karate, football, volleyball, weightlifting, kick-boxing, handball, spirit combat, aerobics, net-ball, etc. Another relatively new attraction is the shooting range at *Zebbug*. A very important traditional sport, the ‘*Bocci*’, is also practised in many localities. There are six clubs distributed around the island and some of facilities lie practically at the water’s edge. This sport is indicated as being very popular in Gozo.

The largest facility (in terms of foot-print) dedicated to sports is the horse-racing track at *Xewkija*. Unfortunately, there are two main problems related to this facility which merit address. These are the negative visual impact and the gross under-utilisation. The most frequented facilities are probably the Gozo Sports Complex at *Rabat* and the Gozo Football stadium at *Xewkija*. In both cases, the facilities provide a good service. There may be scope to address the traffic generation problem created during weekends especially in the vicinity of the Gozo football stadium<sup>104</sup>.

<sup>103</sup> Based on Meeting with Dr. Chris Said, President of the Gozo Football Association.

<sup>104</sup> The issues related to the Gozo football stadium were addressed in the dissertation by Mark Cini entitled “Action Plan for *Tal-Imghajjen* Area, Xewkija”

The topic study on recreation has indicated that by Maltese standards, Gozo is fairly well provided for in terms of urban formal public open space. However, most of the Local councils in Gozo, still require of an additional average of around 2,300 sq. meters of public open space. At the time of writing, the actual figures were still being compiled, so this figure is only provisional<sup>105</sup>. It is rather difficult to find public open spaces in urban areas but there are two main directions that may be considered. One is to explore the possibility of pedestrianisation of certain piazzas

#### 10.4.4 Urban Informal Recreation

Urban areas are not normally associated with informal recreation. However in most urban settlements, there are almost invariably spaces where informal recreation can take place. In Gozo, these can vary from piazzas (with a number of seating areas) to public gardens. The only sizeable mature public garden in an urban area on the island is *Rundle gardens*. Other informal urban recreational areas include football grounds, playing fields, belvederes and promenades.

The Cultural Committee within the Ministry for Gozo is a major organiser of recreational and cultural activities. Nowadays these activities are marked on the Gozitan calendar. These include activities like Carnival, summer feasts (that incorporate cultural, events, orchestras, live bands, poetry evenings, exhibitions, etc.) in piazzas all around the island as well as the traditional agricultural fair and exhibition that is organised on the 14<sup>th</sup> and 15<sup>th</sup> of August. The main celebrations/activities take place in *Rabat* where provision for facilities like traffic management and public security is essential for the success of such activities. Certain facilities are still lacking and provision needs to be addressed.

During the summer season, feasts are organised by the local church and band clubs nearly every weekend. These feasts are dedicated to the local patron and form part of the tradition of the islanders. It must be noted that most of the feasts are very popular and attract thousands of people from all over the island as well as from Malta. The feasts are organised both in church as well as externally in the streets of the towns and villages where bands clubs perform marches with the statue of the celebrated saint while fireworks displays compliment the evening.

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<sup>105</sup> Provisional figures were compiled through the Topic paper on recreation which will eventually form part of the Structure Plan review on this particular topic.

**TABLE 10.3****BAND CLUBS IN GOZO (1999)**

LOCATION	No. of Band Clubs per Locality
GHAJNSIELEM	1
KERCEM	1
NADUR	1
QALA	1
SANNAT	1
VICTORIA	2
XAGHRA	1
XEWKIJA	1
ZEBBUG	1

Source : Gozo and Comino Planning team

There are two main band clubs in Victoria - *La Stella* and *Leone*, these have two major complexes that offer recreational facilities<sup>106</sup>. Activities range from operas, operettas, films, night-clubs (*Planet Discotheque* and *Thunder Night Club*), bingo as well as snooker facilities. These places attract many people especially in winter and on Sunday afternoons. Four cinemas are found in Gozo. These are *Astra Theatre*, *Oratorju Don Bosco*, *Odeon* and *Citadel Theatre*. The first three cinemas date back to the seventies while the later is a high standard modern cinema, equipped with the latest technologies.

Basically each locality in Gozo has a playing field. This is rather good for such as small island although it would be ideal for the larger localities in Gozo to have more than one playing field since the spread out planimetry of some localities places a particular playing field beyond acceptable walking distance for children and their parents. Some of the existing playing fields are also in need of safer layouts, better choice of planting, soft impact absorbing material on areas near the playing equipment, maintenance of playing equipment, the provision of toilets, areas reserved for cycling, a first aid box and trained personnel for the treatment of minor injuries and a good number of waste bins.

Most localities have either dedicated football grounds or else can use school football grounds after school hours. Practically all of these grounds have a hard surface and it may be a good idea to eventually have these grounds covered in a softer material such as artificial turf to render them safer. Most of the football grounds are used for informal football matches and also double up as training pitches.

Other informal recreational activities take place in pubs, bars, restaurants and night-clubs around the island. The major recreational complex is *La Grotta* and *Paradiso Pub*. These attract the majority of young people thus creating major parking problems and traffic jams (mainly in weekends) on the *Xlendi Road* linking *Fontana* to *Xlendi Bay*.

<sup>106</sup> Meetings were held between the Gozo and Comino Local plan team and high level officials of these band clubs

The topography of Gozo and the relationship between the settlements and the ridge edges makes it an ideal place to have panoramic viewing spots. A number of belvederes already exist. Most of these need to be upgraded and a number of them are not located close to the settlement centres. There is also scope for the creation of belvederes on the roof of sizeable rooms (eg. substations or stores) which are located on a strong difference in level in such a way that the roof level of the structure coincides with the adjacent pavement level. Ideally, belvederes should have only very low-level lighting so that distance views at night are not overwhelmed by glare from luminaires mounted at higher levels. Promenades also serve the function to provide a pleasant stretch of coastal strip that is available for strolling. The limited territory in Gozo implies that even areas such as the breakwater arm of *Mgarr* harbour are used as a promenade in weekends and on public holidays.

A number of hikers, walkers, joggers, cyclists and horse riders currently share the vehicular carriageway with motor vehicles. There is a good scope to encourage pedestrian activity even in urban areas. However the existing lack of segregation between vehicular and pedestrian or cycling traffic discourages many from practising these activities. There is scope to have parts of the wider roads especially those linking one settlement to another, to have segregation between pedestrian and vehicular traffic.

#### 10.4.5 Rural Informal Recreation

There are a number of rural areas where informal recreation takes place but some areas tend to act as magnets. In such areas, people tend to congregate more than in other areas. Areas such as *Dwejra* with its *Inland Sea*, *Il-Gebli tal-General*, the *Zerka* window and all its geomorphologic features represents one such example of a visitor attraction. Natural features present a very good opportunity for enjoyment in a serene setting, far away from the confusion and congestion of the more developed areas. It is also an ideal place to escape from the hectic urban life.

Weekend family outings constitute the most widespread form of informal rural recreation in winter. However, families prefer to lie close to their car and therefore the influence of this form of recreation is mainly limited to the vicinity of vehicular carriageways and parking areas. This phenomenon is important in terms of visitor management, the provision of direction signs and interpretation panels and planning for the limitation of waste generation and waste collection. In summer, the focus of informal activities turns to the coastal areas, especially the easily accessible ones. Bathing is a very popular form of summer recreation as are snorkelling, fishing and barbecues. The main problems with these activities is the relatively high number of users being concentrated within a very small area. Consequently congestion occurs in areas such as *Marsalforn*, *Xlendi*, *Ramla*, *Hondoq ir-Rummi* and *Mgarr ix-Xini*. Maritime congestion also occurs in the *Bejn il-Kmiemen* area (*Blue Lagoon*) due to the presence of many bathers and the large number of marine craft. Diving is also becoming very popular, creating additional pressures not only on the land/sea interface but also in the submarine environment. From an economic point of view, diving can be considered as a very lucrative form of revenue generating recreation for Gozo and sometimes this activity is so well organised that it is considered as a formal form of recreation. On a more limited scale, camping takes place ad hoc. There is only

one site designated for camping on Comino. There are no sites designated for caravans and there are no “caravan settlements” on Gozo and Comino. Indeed, caravans are rather a rare sight.

Hunting and trapping are widely practised especially in the milder months. The land-use implications of these activities are different. Hunting is practised in a manner whereby the hunter may opt to use or not use a shelter from where to conduct the activity. The main spatial implication of hunting are the creation of noise, the hazards associated with stray shot in the vicinity of occupied areas (including strollers in the vicinity of hunting activities), littering of large areas with lead shot and conflict with other recreational activities. Trapping has different land-use impacts through the creation of shoddy shelters, the clearing of patches of vegetation for the laying of the nets, the release of herbicides to clear vegetation and the introduction of numerous cages supported on a pipe topped by a small stone slab. Apart from wildlife protection considerations, the main problem with this form of recreation is that it requires considerable stretches of land to be practised properly and open land is a very scarce resource in the Maltese Islands. A positive outcome of this form of recreation is that some individuals who practice this hobby are purchasing tracts of abandoned land and planting trees to help them undertake this activity. The choice of trees is usually Eucalyptus and this is most unfortunate since whilst this type of tree grows quickly, it is an alien tree and is visually and ecologically incompatible with the rural landscape of Gozo. Moreover, since the germane parcel of land is often rectangular in shape, the end result is often a rectangular patch of trees in the middle of otherwise terraced agricultural land. There is ample scope for reducing, through visual mitigating measures, the existing facilities. Provision of additional facilities would be most problematic as the existing spatial provision is already overcrowded.

One type of activity which can be considered to be very important but is rarely classified as informal recreation is the manufacture and display of fireworks. There are three licensed fireworks factories in Gozo and there are indications that fireworks are illegally manufactured in other areas. Whilst the manufacture of fireworks is a relatively low profile activity, it does involve considerable community effort and land use implications do not only include the provision of manufacturing facilities but also the designation of a safety buffer zone around the manufacturing and storage facilities as well as the provision of good access routes for emergency vehicles in case things go wrong. Fireworks displays are most prominent and apart from recreation value, they are also important to the Island’s tourist industry. The major land use implications of displays is neighbour compatibility in view of the high noise levels, buffer zones required around display areas and the risk of injury or fire from aerial fireworks which explode at or near ground level.

Horses riding, walking and cycling represent excellent informal recreational opportunities especially in the relatively tranquil and picturesque setting of Gozo. To date, there was only one operator who proposed to offer this service. However, his proposal was refused on planning grounds.

## 10.5 Recreation Policy Approach

### 10.5.1 Objectives and Strategy

The very great value of public open spaces should not only be considered in terms of socio-economic amenity but also as an important contribution to the conservation of the natural and cultural-heritage of the area. Thus the aim of the local plan should focus on balancing very carefully the competing claims of different land-uses and the community's long term requirements for open space. Therefore, every endeavour should be made to safeguard the existing urban and rural open spaces and to continue to maintain and upgrade them. Public open spaces are essential to a high quality of life which Gozo and Comino must strive to attain.

The very restricted territorial extent of Gozo and Comino and the relatively high population density implies that the many recreational activities already create conflicts. This is especially true of the open-air informal recreational activities. New ways have to be explored in order to minimise these conflicts. Activities where a very large area is required per individual undertaking a specific recreational activity should not be encouraged. On the other hand, activities which entail “time-sharing” of the same parcel of land should be encouraged as this form of recreation makes more efficient use of land. All recreational activities should be subject to integrating well with the natural and cultural context in which they are envisaged to occur and should respect all the other planning policies.

Gozo has a rich history, as evidenced by the rich archaeological heritage as well as the urban and rural architecture. Unfortunately this cultural heritage is not being well utilised to the full. Government and the private sector do not invest enough in this recreational, cultural and educational resource where Gozo has a clear edge over many other overseas resorts. Investment is thus still mainly being directed at sun, sea and sand related recreation whereby many overseas resorts can easily compete; often with a clear advantage in terms of choice, quality and economies of scale. Consequently, those items which can offer a good recreational experience, especially when combined with cultural and educational value, are being left to crumble whilst new facilities which destroy the natural qualities of rural Gozo are being invested in. Clearly, this situation merits close attention and revision of approach.

In the policy formulation process, the following main objectives should be pursued to:

- Create more spaces for recreation with special emphasis on informal and rural recreation.
- Improve and manage pedestrian access in rural areas.
- Rehabilitate suitable degraded habitats for recreational use.
- Encourage “time-sharing” of existing and envisaged urban and rural facilities to accommodate different land-use activities.
- Further enhance and embellish existing recreational areas.
- Introduce innovative, well-understood and cost effective means to facilitate interpretation of natural and cultural features.
- Increase provision of urban informal recreation facilities for children and elderly.
- Existing and envisaged recreational facilities should be safeguarded from change of use.

The approach to enhancing recreational facilities in Gozo is quite complex. The large number of interests and the relatively considerable extent of the territory render island wide management of recreational activities quite a challenge. However, extensive and planned co-ordination of tasks over an agreed time frame can somewhat facilitate the daunting task. Clearly, not all of the objectives indicated in **Section 10.2.1** can be achieved in a short time frame. Therefore, the first task would be to prioritise according to resources. A good approach would be to identify a number of small projects that can be achieved with a minimum of resources and within a short time frame but whose impact as pilot projects would be incommensurate with the resources dedicated to the execution of the germane intervention. If such pilot projects are successful, these will encourage wider initiatives and attract additional resources (including funding).

In urban areas there are a number of areas which merit attention in order to increase amenity. Examples that immediately spring to mind include piazzas which are currently extensive expanses of tarmac. Such spaces have significant potential to encourage community interaction and present great challenges for designers to provide an urban space which complements the surrounding architectural context but at the same meets modern requirements. In such cases, careful consideration to safety, traffic segregation and parking should be given special attention. Other examples include dilapidated buildings or abandoned or under-utilised public land in urban areas. Sites which offer extensive long distance views should be considered for development as belvederes.

Given the size and population, Gozo can be described as being fairly well provided for in terms of sports facilities. This does not imply that there is no room for improvement. There are two main considerations that have to be borne in mind in this respect. The first is to create new sports facilities in urban areas or within rural areas which are already committed for such use (eg. the Xewkija horse racing track).

Rural areas in general offer different possibilities. The limited traffic along rural roads presents an opportunity for the carriageway to double up as a rural pedestrian route. Walking pathways can be carefully designed so that they meet the requirements of a wide sector of the population. They should be circular, preferably starting and terminating either at a town or village or at a strategically located car parking area. The creation of new rural car parking lots is not encouraged, however, there may be scope to rationalize existing large parking lots. There is also the possibility to create pocket parking lots (not more than 10 car-parking spaces) either along wide stretches of existing road or on visually inconspicuous existing disturbed ground. Planting of new indigenous trees on remodelled disturbed ground and provision of rural related recreation facilities should also be actively considered. In the latter cases, outdoor furniture should be limited and designed in natural looking unfinished timber or appropriately designed stone. Designs for rural recreation facilities should be informal and should not be given the same degree of refinement as facilities intended for urban recreation. In all cases, there is ample scope to couple enjoyment with education through suitable recreational facilities.

# 11. AGRICULTURE, HORTICULTURE AND FISHERIES

## 11.1 Introduction

The Structure Plan for the Maltese Islands has indicated the whole of Gozo and Comino as a Rural Conservation Area (RCA). This strategic policy direction indicates that Gozo should remain predominantly rural in character. The general policy also implicitly safeguards land which is necessary for the cultivation of agricultural products and the rearing of livestock.

Agriculture is important to the economy of Gozo in a number of ways. In 1994, 3,206 persons (part-time or full-time) were registered as being employed in cultivation. During the same year, 161 were registered as being employed in animal husbandry. In 1999, there were 163 persons registered in animal husbandry<sup>107</sup>. Around one third of the Gozo workforce operate in the agricultural sector.<sup>108</sup> From an employment point of view agriculture is therefore quite important. In 1994 it was reported that dairy products alone contributed to around Lm2,000,000 to the economy of Gozo. During the same year, Gozo was estimated to produce 12% of the national products of fruits and vegetables sold at the vegetable market Gozo “*Pitkali*”. Gozo is said to be self sufficient in milk, pork, poultry, meat, rabbit meat and eggs. In fact, part of this produce is shipped to mainland Malta.

Agriculture also contributes indirectly to the economy. The tourism and catering industry relies heavily on agricultural and fisheries products. If these products had to be imported at a higher cost, this would adversely effect the competitiveness of the tourism sector which is another pillar of the Gozitan economy. Traditional agriculture also contributes to the maintenance of the Gozitan landscape, a large proportion of which is man-made and man-maintained. Gozo’s rural appeal is highly dependent on traditional agriculture being maintained. Maltese seek Gozo for its relatively undeveloped character and its breathtaking landscape. The “Maltese tourist” contributes heavily to the economy of the Island. Maltese and overseas visitors seek farmhouses in the middle of the countryside or transient resident accommodation with views of the countryside. Abandoned or derelict agricultural land detracts from the landscape quality. It is therefore very important to keep the land under active traditional cultivation.

The fisheries industry also contributes in other ways to the economy of Gozo. Apart from its importance to the catering and tourism industry, the fishing vessels give a special character to the fishing ports of Gozo.

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<sup>107</sup> Source - Department of Veterinary Services

<sup>108</sup> Agriculture - A Pillar of Sustainable Development pp 7-19

## 11.2 Policy Background

There are 14 policies relating to Agriculture Horticulture and fisheries. Most of these are directed to improvement in the practice of cultivation, animal husbandry, horticulture, fisheries and aquaculture.

Policy **AHF 1** indicates that there should be a major improvement in agricultural, horticultural and fisheries practices. Yields in agriculture have increased but land continued to be abandoned for various reasons. Initiatives to link agricultural requirements with planning requirements have generally been based on an ad hoc rather than an integrated approach. As a result, policy **AHF 2** has not materialised. However the water provision for agricultural and landscape irrigation has increased through the creation of small open reservoirs and the digging of boreholes. **AHF 3** has been to an extent implemented through the various agricultural censuses and through the agricultural survey commissioned by the Planning Authority and undertaken in 1999-2000. A planning classification for agricultural land is still being compiled<sup>109</sup>. Policy **AHF 4** has been implemented in some areas through additional soil replenishment. In other areas, the lack of maintenance on rubble walls and improper cultivation management has resulted in continued soil erosion.

Development control has been instrumental in implementing **AHF 5**. Conditions in permits as well as the introduction of bank guarantees in certain situations has resulted in better buildings in the countryside. Visual mitigation measures were also often introduced to this effect. Sensitive conversion of existing farmhouses has been particularly effective in Gozo. All this notwithstanding, the general standard of agriculture and farm related building still leaves much to be desired. Policy **AHF 6** has probably addressed part of the single -most important problem in agriculture: ie. land fragmentation. No effective mechanism has yet been achieved in order to implement this policy. In this respect, more success is envisaged to have been achieved on public land. Again development control has proved to be an important tool in promoting the aim for a more visually pleasant rural countryside as envisaged in policies **AHF 7** and **AHF 8**. Some success has been registered but much more needs to be done. Policy **AHF 9** addresses the problem of relocating obnoxious farming activities from residential areas. Some success has been registered with this policy again through development control tools but some animal husbandry units continue to operate in residential areas. **AHF 10** has also been implemented to a degree especially with the building of the grading and packing factory at *Xewkija*. Policies **AHF 11** and **AHF 12** are more relevant to mainland Malta.

Policy **AHF 13** has in general not been implemented although there were ad hoc interventions, originating mainly from the Dept. of Agriculture, Local Councils and the Works Department, which tried to improve rural roads. The results were often far from ideal as the techniques employed were normally shoddy. On sloping terrain, the concrete surface has offered less resistance to water flow during torrential rain. Consequently, greater damage was registered downstream as the high water velocities caused considerable damage to fields, crops and rubble walls. Furthermore, soil erosion is accelerated. **AHF 13.2** is generally implemented in spite of

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<sup>109</sup> Note: Personal communication with EMU. Project being undertaken jointly with the Department of Agriculture.

short leases as only in very rare instances have annual agricultural leases been revoked. On the other hand, **AHF 13.3** which relates to the encouragement of larger and more viable farm concerns has not been implemented. Similarly **AHF 14.4**, which relates to the identification of secure boat storage and maintenance facilities has not been implemented although there are waterfront areas in *Mgarr* harbour, *Marsalforn* and *Xlendi* where dry storage of marine craft takes place.

Gozo has only fairly recently been selected for the location of sea-based aquaculture units. Several Cages off the island of Comino have been operational for some years and an application for tuna penning near *Ta' Cenc* has been submitted to the Planning Authority. An alternative offshore area for the *Ta' Cenc* site was subsequently selected. Planning permission for a land-based fish farming facility was approved at the ex-desalination plant at *Hondoq ir-Rummien* but no works have been undertaken to this effect. In all of these projects, the criteria set out in policies **AHF 15** and **AHF 16** were only partially observed in terms of minimisation of visual impact and the restriction of land based units to quarries and industrial areas. All production units are situated quite close to the coast and thus visual impact is fairly evident. The location criteria of **AHF 15** to establish land-based units in industrial estates of former quarries has been observed in the award of the permit to the *Hondoq ir-Rummien* land based hatchery.

Apart from Structure Plan policy direction, addition guidance was provided through:

- a) Policy guidance on fish-farming (1995)
- b) Policy guidance on farmhouses and farm buildings. (1994)

The first policy paper concentrated mainly on the planning permit and operational requirements whilst the latter policy paper concentrated mainly on the visual quality of rural buildings. Both guidance papers are in dire need of updating and revision because there is much room for interpretation and circumstances have changed since the time of issue.

### 11.3 Traditional Cultivation

When compared to mainland Malta, Gozo is relatively un-built and quite extensive portions of the territory are covered by fields. Recent surveys commissioned by the Planning Authority indicate that agriculture remains the dominant land-use in Gozo with around 60% of the island being used for some form of agriculture<sup>110</sup>. It is difficult to quantify precisely how much land is being abandoned as the agricultural classification system used in the various agricultural surveys and censuses varies from one survey to the other. However, abandoned agricultural land is evidently on the increase especially on the steeper slopes near the taluses of Gozo.

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<sup>110</sup> Gozo and Comino Local Plan- Agricultural land-use and Fisheries Survey – Feb 2000 (Malta University Services) a study commissioned by the Planning Authority.

**TABLE 11.1****AGRICULTURAL LAND IN GOZO**

1955		1983		1991		1999	
Type	Cover (ha)	Type	Cover (ha)	Type	Cover (ha)	Type	Cover (ha)
Irrigated	122	Irrigated	28	Irrigated	45	Irrigated	628.8
Dry	3676	Semi-irrigated	7	Dry	1505	Semi-irrigated	150.5
Wasteland	248	Dry	2133	Wasteland	150	Fruit orchards	159.8
		Wasteland	168			Greenhouses	17.8
						Silviculture	52.9
						Floriculture	2.6
						Arid Summer Crops	115.8
						Fallow	666.4
						Forage	1544.7
						Abandoned	1830.9
<b>TOTAL (A)</b>	<b>4046</b>	<b>TOTAL (A)</b>	<b>2336</b>	<b>TOTAL (A)</b>	<b>1700</b>	<b>TOTAL (A)</b>	<b>5170.2</b>
<b>TOTAL (B)</b>	<b>3798</b>	<b>TOTAL (B)</b>	<b>2168</b>	<b>TOTAL (B)</b>	<b>1550</b>	<b>TOTAL (B)</b>	<b>3339.3</b>

Sources : “Gozo and Comino Local Plan - Agricultural Land Use and Fisheries Survey”, Planning Authority 2000 (unpublished) and “Agriculture - A pillar of sustainable Development in Gozo” , Bank of Valletta, 1994.

Note: Total (A) refers to total registered agricultural land whilst Total (B) refers to total registered agricultural land less wasteland or abandoned land. Also note that figures for 1999 do not include the Ta' Cenc area.

**TABLE 11.1** indicates the amount of agricultural land in Gozo since 1955. In general, the table is indicating a decrease between 1955 and 1991 but then there is a dramatic increase in agricultural land in 1999. However, the figures indicated in **TABLE 11.1** have to be considered with great discretion. The main problem lies with the fact that the criteria for establishing the type of agricultural land have varied from one interval to the other, thus there can be no real correlation as the classification is different. Moreover, the years 1955 to 1991 are based on registration whilst the year 1999 is based on a field survey plotted on a GIS base. It is therefore possible that there was under-registration has occurred between 1955 and 1991. It is important to note that total agricultural land excluding abandoned and wasteland has still decreased since 1955. Meetings with officials from the Department of Agriculture and cultivators have indicated a number of possible reasons for the abandonment of agricultural land. These include:

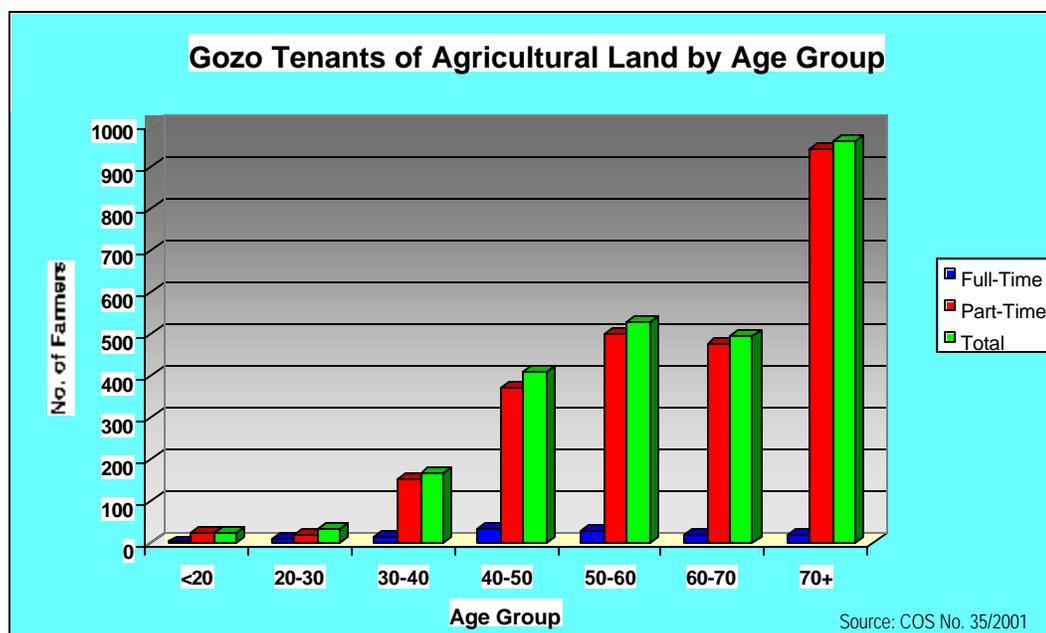
- a) Land-ownership or titles - division and further subdivision of tenements through inheritance is leading to a further decrease of the size of agricultural plots owned or tilled by one farmer. This may cause viability problems. When a plot size becomes too small, it may not sustain a family through yearly income. There may also be problems related to title or disputes over the land in question.

- b) Other job opportunities – These may be preferred to farming which is very labour intensive and subject to a lot of uncertainty related to weather, crop disease and a very volatile market. Other job opportunities may also be considered to render more in financial terms than cultivation related opportunities. These factors may explain why the number of full time farmers in on the decline whilst the number of part-time farmers is on the increase. Additionally, agriculture is not generally being perceived as a “trendy” occupation.
- c) Speculation - Ownership of land in the vicinity of schemes or near areas perceived as ripe for development and as a viable investment opportunity. Thus land is retained idle in hope that if it is perceived as non productive land, there would be a better chance of promoting it as ripe for development.
- d) Traditional cultivation methods – These are perceived in certain instances to give lower and inferior yields. Modern methods however require substantial investment and the net income may not be viable in the long run. There are also difficulties in obtaining planning permission for some proposals indicating modern cultivation methods.
- e) Topography and Access - Lack of vehicular access and steep topography are not generally considered amenable to modern agricultural practices.

Traditional cultivation methods also employ readily available material such as animal manure to maintain soil fertility. Rubble walls also use readily available material to good effect. Nowadays, the maintenance of field walls is considered to take up valuable time from the farmers other activities and these fall in disrepair. Therefore, farmers often resort to “*frankā*” blocks as a cheaper substitute. Labour costs and the time taken to built rubble walls, are nowadays considered to be impractical. “*Frankā*” block walls are however rather unsightly in a rural context and this practice should be actively discouraged<sup>111</sup>. Fortunately, the practice of replacing random rubble walls with “*frankā*” block is as yet not as widespread as it is in mainland Malta. In certain parts of Gozo, such as *Nadur*, cane reeds are employed in conjunction with or in lieu of rubble walls. This gives a special character to the area whilst at the same time these reed curtains serve as very effective wind breaks. Their use should be encouraged, as when well assembled, these reed curtains tend to blend well in the landscape. In other areas, prickly pears are used to demarcate tenancies.

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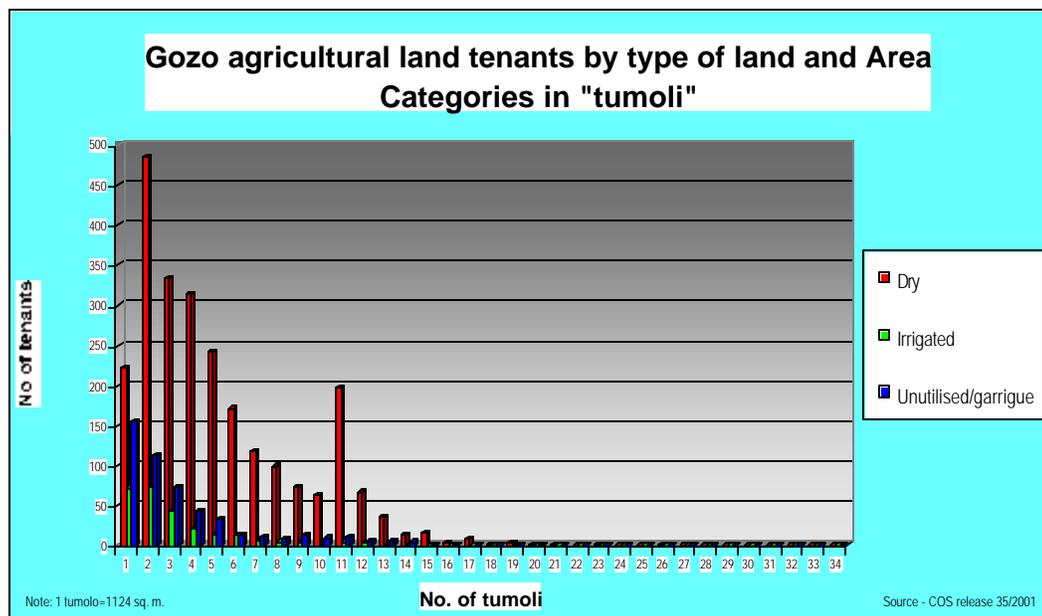
<sup>111</sup> A note on rubble walls was considered by the Planning Authority in May 1995. To date, there are no published guidelines by the Planning authority relating to rubble walls.

**TABLE 11.2****AGRICULTURAL LAND IN GOZO**

Source: National Statistics Office

Another point of concern appears through **TABLE 11.2**. This shows that most of the registered farmers in Gozo are practically senior citizens. Given indications that the parcels of agricultural land are decreasing in size and that the number of young farmers are decreasing, one may be led to conclude that the prospects of traditional cultivation are bleak and that further abandonment of agricultural land may be expected.

**TABLE 11.3** on the other hand shows that almost 69% of the registered agricultural land in Gozo covers an area of less than 5 *tumoli* (c.0.562 ha). Given that economies of scale can only be achieved through cultivation on a large scale, it is difficult to see how through further subdivision, agriculture can remain competitive. It is not unlikely to envisage that unless other precautions are taken, products imported from nearby countries will be much cheaper than the local products in spite of additional transportation and handling costs. If this situation is reached, it would be very difficult to encourage further growth in traditional cultivation in Gozo.

**TABLE 11.3****AGRICULTURAL TENANCIES IN GOZO BY SIZE OF LAND PARCEL  
AND TYPE OF LAND**

Source: National Statistics Office

## 11.4 Modern Cultivation Methods

As with any other productive activity, modern methods of cultivation have slowly been integrated into Gozitan agricultural practices. These methods are employed to achieve the following main outcomes to:

- a) Increase productivity per hectare.
- b) Render physical labour easier.
- c) Conduct activities such as sowing, tilling, irrigation and harvesting in a shorter period of time.
- d) Make the product available out of season, thus fetching a higher price
- e) Access through “new” technologies resources (eg. water) that otherwise would not be available.
- f) Raise crops which without the intervention of modern methods would be very difficult to cultivate.
- g) Raise crops on land which would otherwise be infertile. (eg. through reclamation)
- h) Introduce crop varieties which are more adapted and tolerant to local conditions.

Whilst most modern agricultural practices do make lighter work of the farmer’s considerable burden in tilling his fields, increase the yields and in some cases improve the quality of the product,

most of them do leave negative side effects. These include adverse scenic impact, chemical contamination, destruction of natural habitats, heavy demands on restricted water supplies, increased soil erosion and in some instances promote pest proliferation.

#### 11.4.1 Greenhouses and Cloches

Greenhouses are perceived as ideal structures to promote agriculture as they create local climates which render cultivation more manageable and less prone to adverse weather effects. When well managed, greenhouses increase yield considerably. However, greenhouses impart a number of adverse land-use implications. The most important is the visual impact. The use of large areas of plastic, steel or aluminium in the countryside makes greenhouses stand out in stark contrast with the surrounding traditionally cultivated countryside. The effect is rendered more acute when the topography is undulating and the greenhouses can be observed from prominent viewpoints. It is very difficult to mitigate on the visual impact imparted by greenhouses as any intervention which reduces incoming solar radiation counters the very rationale behind the erection of the greenhouse in the first place.

In the case of greenhouses, it is almost imperative to use chemicals such as pesticides, herbicides and fertilisers. Some of these toxic chemicals are known to constitute a serious health risk when used in an uncontrolled manner. Moreover, there is an aquifer contamination risk. The higher temperatures and humidity achieved within greenhouses and cloches are also known to encourage the proliferation of plant pests which would not otherwise propagate. Furthermore, elevated temperatures encourage faster spread of disease and deterioration unless constantly monitored and controlled. Additionally, the higher productivity achieved may lead to an economically counterproductive effect in a closed market. The market could be flooded with produce and thus the product fetches a lower price.

The location of greenhouses and cloches is critical if their visual impact is to be retained at the least possible level. The best possible landform is a plateau which is not overseen by higher ground and which is slightly depressed at its centre. However, few such locations exist in Gozo. Furthermore, most of the higher ground in Gozo is not available for greenhouse development. The main constraints are:

- a) Areas already committed by urban development.
- b) Sites which are not accessible.
- c) Are not suitable for cultivation due to high exposure to winds, lack of water or lack of fertile soil.
- d) Protected sites (Ecological, scientific, archaeological, cultural or landscape importance)

From a planning point of view, greenhouses and cloches are not visual enhancing features and traditional cultivation methods are in this respect preferred. However, in certain instances, greenhouses are necessary to increase and diversify production. Areas close to urban development and where significantly higher ground does not lie in the vicinity may partially mitigate scenic impact. It is however rather difficult to camouflage greenhouses as any screening material would reduce the necessary insolation required for plant growth. However, the planting of soft-fruit trees to further mitigate the visual impact should be considered as these can

contribute to mitigate edge-on visual impact. Obviously, it is not advisable to construct greenhouses (or to employ cloches) on north-facing slopes.

#### 11.4.2 Agricultural Stores

Agricultural stores per se may not be considered as a modern development. Traditional structures such as small rural stores and the traditional “girma” have been around for hundreds of years. The main difference with the more modern counterparts lies in terms of numbers, size, design and materials employed.

Whilst an agricultural store can have some benefits which contribute to the practice of agriculture in Gozo, there are many issues which need to be addressed. The main intended use of an agricultural store is for the temporary storage of implements (related to cultivation) and of harvested products. It is a well-known fact that most of the existent stores are not at all employed as agricultural stores. Some are known to serve as weekend family small shelters, others as convenient hunting and trapping hides whilst some are used to conduct a non-agriculturally related business. A number of so-called “agricultural rooms” also serve as vehicle maintenance related garages or as a pretext for larger rural residences. On the other-hand, agricultural stores may be needed to accommodate agricultural tools, agricultural machinery or to store agricultural products prior to conveyance to the market. There are however concerns that agricultural stores are not really used for agricultural storage purposes as there is fear that implements or products left overnight might be subject to theft<sup>112</sup>. These rooms are almost invariably unlit and unattended at night. Additionally, a significant number of farmers have garages adjacent to (or near) their homes and the agricultural implements are normally stored there.

It is often difficult to differentiate between genuine agricultural needs and non-genuine proposals for rural development. However, genuine farmers are being penalised due to the abuse of individuals who apply for planning permission under the pretence of agriculture development. It is also important to note that given that most cultivation is conducted on moderately steep clay slopes, the construction of relatively large stores could present structural problems as clay on a slope is geologically unstable. In Gozo, there are a number of agricultural rooms built on clay slopes which display cracks: evidence of differential settlement.

There is an additional problem with agricultural stores. The continued subdivision of agricultural land implies that each farmer could potentially make demands for stores on his parcel of land. This could potentially lead to a proliferation of agricultural rooms in the Gozo rural landscape. The Environmental Management Unit of the Planning Authority<sup>113</sup> has embarked on the task to revise the current eligibility criteria for agricultural stores so that these are more in line with modern requirements and do not unnecessarily penalise farmers with genuine intentions.

<sup>112</sup> This caravan was conveyed by various farmers and officials from the department of agriculture.

<sup>113</sup> Eligibility criteria are being incorporated in Draft guidelines for the determination of planning proposals related to agricultural stores. These guidelines are being compiled with the collaboration of the Department of Agriculture.

### 11.4.3 Irrigation

Water is a major element to successful agricultural practice. Whilst a significant proportion of agricultural land in Gozo depends almost exclusively on natural rainfall, irrigated and semi-irrigated land usually has arrangements for the artificial supply of water especially during the drier months. There are a number of ways how water shortage problem can be overcome. These vary from channelling water from natural sources such as streams or watercourses, pumping water from open reservoirs, pumping water from underground wells, digging boreholes and resorting to water bowsers. Illegal methods of irrigation such as tapping the potable water supply network or the sewerage system are not unknown.

From a planning point of view, the storage of water from natural systems is commendable, provided that the structure employed to store the water is either totally hidden from view or else blends nicely into the rural landscape. The pumping of water from areas constructed to hold water behind them (eg. dams) is also commendable as rainwater is being put to good use rather than finding its way to the sea. Completely roofed underground reservoirs have been employed in some instances. These have the added advantage of not precluding the overlying areas from being cultivated and restrict losses through evaporation. However, such reservoirs are more expensive to build and maintain. Low-lying open reservoirs are more conspicuous but when screened through traditional materials they often blend well into the landscape especially when trees are planted close by.

Wind pumps used to be popular methods of extracting water but in Gozo most have fallen into disrepair and are being replaced by the more efficient electric or fuel powered water-pumps. Small concentration of wind-pumps add character to the landscape provided that they are suitably designed and are well maintained. They also add a dynamic element during the windier days.

Bore-holes represent another water extraction method. If unchecked, this method could lead to over-pumping and the gradual salinisation of the aquifer due to the additional ingress of seawater. If water with increased salt content is used for irrigation, this could lead to salinization of soil, rendering it less productive. Another concern from a land-use point of view relates to the construction of pump rooms. Although small in size, the littering of the Gozitan rural landscape with pump rooms could have a considerable adverse negative effect on the positive landscape qualities. An additional negative scenic impact is constituted by the poles which are installed in fields to convey electricity to the pump room.

New methods of irrigation were also introduced during the last twenty years. Sprinklers were initially favoured but these tend to consume appreciable amounts of water and in summer the evaporation losses are very high. Furthermore, any salts in the water are concentrated if substantial evaporation takes place. A better approach is the utilisation of drip irrigation techniques. The main problem with this approach is that once the plastic pipes are no longer needed, these are often disposed of along the side of the field.

### 11.4.4 Agricultural Access

Access is very important to agriculture as it helps the farmer to gain access to his fields and to carry tools, equipment to undertake cultivation activities. Furthermore, access helps the farmer to convey the products out of the fields. In recent years, there has been an increase in the number

of accesses constructed in the fields. Field accesses are mainly constructed either on previous footpaths in order to gain vehicular access or else to provide new access where previously it was non-existent.

Access roads in rural areas are mainly constructed in concrete. It is important to limit the width of such access to the barest minimum so that a small truck can pass with widening at intervals to permit the passage of two vehicles moving in opposite directions. The roads should be flanked in traditional rubble walls which shall not block views to strollers or passengers in vehicles. Great care has to be taken in the construction of rural access. Concrete is not an ideal material to use in the countryside but its negative visual impact can be mitigated through the use of earth colours. The texture of the road surface is very important. The current rural roads which lie on a slope help to accelerate water flow during torrential rain. This phenomenon is disruptive to agriculture as the force of the water often bursts field walls and accelerates soil erosion. Therefore rural roads should be constructed in such a manner whereby water flow is slowed down and diverted to the fields where it is employed to good effect.

#### 11.4.5 Dereliction

Modern agricultural practices often ignore traditional practices which used to embellish the rural landscapes. Rubble walls are not maintained or are replaced by franka blocks, oil drums or other non-compatible materials. Heaps of rubble often litter areas near stores and newer constructions rarely seem to get rid of all the construction related debris from the area. Pieces of plastic from cloches or greenhouses often litter fields and disused plastic pipes are sometimes dumped next to rubble walls. Indiscriminate burning in summer leaves large unsightly areas and ashes are blown over considerable distances. Litter and tyres are also sometimes burnt in fields sending columns of smoke into the sky. Field lying next to construction related industry are often “peppered” with a coating of fine white dust which apart from being unsightly, is deleterious to agricultural products. Spalls falling from trucks or dislodged from poorly surfaced roads may find its way into fields, country roads and even beaches, especially after spells of heavy rain.

### 11.5 Horticulture

Although horticulture is not a strategic agricultural activity in the sense that it does not contribute to the feeding of the nation, it helps to create a supplement to the agricultural economy. Horticultural practices in Gozo are not yet as well developed as they are in Malta but interest in this form of cultivation is on the increase. Horticultural practices often take place in greenhouses but these can be less visually conspicuous since often they can be sheathed in a translucent green fabric which in some instances merges fairly well in the landscape especially when the site lies close to urban areas and when the greenhouses lie in a shallow depression on a ridge which is screened by trees or shrubs. Large horticultural greenhouse complexes can nevertheless leave a negative scenic impact by virtue of their scale.

### 11.6 Animal Husbandry

Animal products are well sought after in Gozitan and Maltese markets. The main areas of rearing in Gozo are poultry, dairy and pigs. Gozo also “exports some of the products to mainland Malta. Gozo also currently takes care of the processing of certain milk products such as *rikotta*, cream, peppered cheese and mozzarella for consumption in the Maltese market. **TABLE 11.2**

gives a summary of the number of registered farms in Gozo in two sample years ie. 1994 and 1998.

**TABLE 11.4**

**REGISTERED FARMS IN GOZO**

<b>TYPE</b>	<b>1994</b>	<b>1998</b>
<b>Poultry</b>	75	97
<b>Cattle</b>	65	63
<b>Pigs</b>	21	19
<b>TOTAL</b>	<b>161</b>	<b>179</b>

Source : “Agriculture - a pillar of sustainable development in Gozo”, BOV, 1994 and statistics from the Department of Veterinary Services.

There is no doubt that animal husbandry enterprises are very important for the economy of Gozo. There is also a strategic importance attached to these farms as they lessen dependence on imported food sources. From a planning point of view, there are a number of aspects that have to be studied when addressing the subject of animal farms.

One of the major issues relates to the number and type of farms in Gozo. This is a crucial question as every other parameter associated with animal farms is linked to it. If it transpires that farms of a particular type cater only for the domestic demand (including tourists) and projections indicate that the local and transient populations are not envisaged to increase, then it is not difficult to establish that a finite demand for a certain type of animal product exists or is projected to exist. If too many farms are operating, their operation becomes less economically viable due to oversupply and therefore it is not wise to continue to develop such farms at the expense of the unique Gozitan agriculture and landscape. The whole picture is modified if it transpires that it is economically feasible to export local animal products but to date the evidence to this effect has been rather limited. Even if export is assumed to be economically viable, a decision has to be taken on whether the economic benefit accrued from the construction of farms can outweigh the economic benefits that the traditional Gozitan landscape presents to the visitor. Meetings with officials from the Department of Agriculture in Gozo indicate that there should not be increases in terms of new farms but the emphasis should be directed towards the upgrading of existing farms to EU standards. The problem of relocating farms from urban areas was also indicated as meriting serious consideration.

Animal farms, especially when not well managed, present a number of planning problems. Current traditional practices indicate a tendency towards shabby buildings with a lot of haphazard tipping and dereliction surrounding the farms. There are risks associated with the indiscriminate dumping of animal manure and the proximity of a large number of farms enhances the possibilities of transmittal of disease. There are also hazards associated with the contamination of underground water resources. These problems are accentuated in instances where farms lie within Development Zones. In such instances, neighbours usually mount pressure in order to relocate the farm, in spite of the farm having been in existence prior to the relevant area being

developed for residential purposes. This creates two problems namely; a search process to find suitable land to accommodate the farm in areas ODZ and a planning requirement to indicate proposals for the vacated site. Experience<sup>114</sup> indicates that in view of the considerable environmental constraints in Gozo, it is usually very difficult to find a suitable site to relocate.

Animal farms also present a difficulty with after-use. There are two basic types of after uses of animal farms. These relate to farms ODZ which discontinue operations and farms within scheme which have to relocate due to neighbour pressures. In the former case, it is important to restrict speculation by limiting development of disused agricultural buildings solely for agricultural purposes. Where farms are operating within scheme, it is important to consider any proposals for conversion have to be addressed simultaneously with any application to relocate and to accommodate only uses which are compatible with the surrounding neighbourhood.

The visual impact of farms is normally very evident, especially if the farm covers a relatively large area, is overseen by nearby higher ground and has no visual mitigation measures in design, colour, texture and soft landscaping to alleviate adverse impact on the scenery. Improvements to mitigate the visual impact of farms (apart from location and size) can be addressed in a relatively straightforward manner, however the cost of undertaking even modest improvements to design and maintenance of the farm is considered by many farmers to be an undesirable burden on their already “marginal” profits. In addition to the foregoing, the grouping of a number of farms can have a synergistic adverse scenic impact on the countryside. Discussions with the Department of Agriculture and farmers’ representatives have indicated that there is little scope for addition of new farming concerns, however, there is a lot of scope for modernising the existing concerns. There was therefore the need to study the sector in great detail especially in view of Malta’s application to join the EU whereby the sector would require to be upgraded and thus may qualify for structural and other funds.

## 11.7 Fisheries

The topography of Gozo is such that it has very few harbours suitable for the undertaking of fishing operations of any appreciable size. Sheltered inlets are few and there are only three fishing centres of importance. These are *Mgarr*, *Xlendi* and *Marsalforn*. The existing facilities are adequate for the sizes of vessels at present employed and the breakwater and quay at *Mgarr* may accommodate larger vessels that may be introduced into the industry in the immediate future. However, any increase would be translated into additional operations on an already overcrowded port.

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<sup>114</sup> Experience related to familiarity of various applications requesting relocation of an animal farm from an inhabited area to an area ODZ.

**TABLE 11.5****LICENSED FISHING VESSELS IN MALTA AND GOZO –  
A COMPARISON BY TYPE AND SIZE**

	Trawlers	Longliners/ Netters	Luzzus	Kajjik	Others	Total
<b>MALTA</b>	10	536	258	635	36	1475
<b>GOZO</b>	4	73	74	154	12	317
<b>TOTAL</b>	14	609	789	789	48	1792

	0-8m	8.01-12m	12.01-15m	15.01-20m	20.01-over	Total
<b>MALTA</b>	1259	141	42	15	18	1475
<b>GOZO</b>	270	23	10	10	4	317
<b>TOTAL</b>	1529	164	52	25	22	1792

Source: Gozo and Comino Local Plan, Agricultural Land Use and Fisheries Survey, Feb. 2000, p48. (unpublished)

**TABLE 11.3** above indicates the comparison between licensed fishing vessels in Malta and Gozo. It is clearly evident that in the case of trawlers (the largest vessels), there are only 4 more vessels in Malta than in Gozo. In terms of the ratio of other licensed vessels, there are roughly one fourth of the fishing vessels operating from Gozo.

Up till 31 st. August 1998, there were a total of 317 licensed fishing vessels in Gozo (as opposed to 1,475 in Malta). The most targeted species are Dolphin fish (*coryphaena hippurus*), Blue Fin Tuna (*Thunnus thynnus*), Swordfish (*Xiphias gladius*), Stone Bass (*Polyprion americanus*) and species in the *Sparidae* and *Scorpaenidae* families such as Dentex (*Dentex dentex*), Common Sea Bream (*Pargus pargus*) and Scorpion fish (*Scorpaena porcus*). In all instances these are caught by longlines.

Other demersal species such as King Prawns (*Artisteus antennatus*), Shrimps (*Parapenaeus longirostris*), Hake (*Merluccis merluccius*), Red Mullet (*Mullus barbatus/surmuletus*), Octopus (*Octopus vulgaris*) and various other species including Skates and Rays are caught by trawling.

## 11.8 Policy Approach

### 11.8.1 Objectives

There is little doubt that agriculture is a very important land-use in Gozo, contributing not only to the economy but also to the distinct rural quality of the island. It is also the largest user of land on Gozo. Hence it merits particular attention when it comes to land-use planning.

The main objectives for agriculture in Gozo can be summarised as follows:

- To support traditional cultivation activities so that the special quality of the rural environment is maintained.

- To actively discourage further subdivision of agricultural land.
- To reintroduce abandoned agricultural land (especially on slopes) back into cultivation.
- To maintain rubble-walls to reduce soil erosion and enhance landscape quality.
- To create additional water supply for agriculture to better utilise surface runoff and reduce risk of flooding further downstream whilst utilising the least possible footprint, the least quality agricultural land, and the best visual mitigation measures.
- To discourage over-pumping especially through the removal of the current policy to favourably consider agricultural pump rooms. Apart from being unsightly, pump rooms result in electricity being brought onto the site through visually obtrusive poles, there is little control over the amounts extracted and the rooms are too large to just accommodate a small pump.
- To discourage land-use activities not related to agriculture and which consume precious agricultural land.
- To encourage the better use of organic farming and minimise the use of artificial chemicals and contamination of underground water resources.
- To focus on upgrading existing legitimate farms rather than the construction of new ones.
- To determine the number and type of farms that can be viably supported on Gozo whilst promoting a high scenic quality and reducing pollutants to the surrounding environment.
- To reduce health hazards, dereliction and contamination of water resources by encouraging good animal husbandry practices.
- To discourage speculation on agricultural land.
- To secure adequate port facilities for a commercially viable fisheries industry to flourish.
- To encourage offshore fish farming, preferably having offshore processing facilities.

It is rather difficult to implement the objectives identified above through planning measures alone. Indeed, the efforts of the germane public and private agencies are essential in order to improve the agricultural situation. To this effect it is essential that the relevant public agencies are involved in the development of a plan which amongst other generates a strategy for implementing and agricultural development strategy for the Maltese Islands. This is especially important in view of Malta's application for joining the European Union (EU), given that the said Union gives high priority to agricultural development and that an eventual joining of the EU is envisaged to have very substantial impact on current agricultural practices.

## CONSERVATION

# 12. URBAN CONSERVATION

## 12.1 Introduction

The importance of cultural heritage in the Gozitan context has already been highlighted in previous chapters. The most evident presence of cultural heritage lies in the built matrix of buildings and open spaces that forms the historic areas. Apart from their economic, social, tourism and cultural importance, urban centres are vital as they constitute the immediate physical space whereby a large proportion of the population lives, works, commutes and recreates. Hence, special attention needs to be given to such areas.

## 12.2 Policy Context

The Structure Plan for the Maltese Islands indicates 18 policies related to urban conservation. Some of the policies are directly relevant for local plan purposes either because they highlight requirements for local plan formulation or else because they make specific reference to areas which lie within the Local Plan area.

### 12.2.1 Urban Conservation Areas

In policy **UCO 1**, *Cittadella* and its environs are indicated as “areas of special architectural or historical interest”. To this effect, the area has been declared an urban conservation area and in the case of *Cittadella*, a conservation order has been issued. Policy **UCO 2** has also been partially implemented as the UCA around *Cittadella* has been delineated. The Local Plan for Gozo and Comino will eventually determine whether the existing boundaries are adopted or eventual modifications be undertaken so that the area is conserved in a more appropriate manner.

### 12.2.2 Listed Buildings

Policy **RCO 4** relates that the Planning Authority will designate individual buildings of special conservation merit. This list is updated and maintained through the National Heritage inventory list which is currently maintained by the Environmental Management Unit of the Planning Authority. A number of buildings have already been scheduled in this manner (see policy **UCO 7**). Considerable progress has also been registered on improving the condition of older buildings especially in instances where interventions are envisaged. This has mainly been achieved through the Development Control system adopted by the Planning Authority. The same Planning Authority has been rather rigorous in ensuring that suitable conditions and if necessary bank guarantees are imposed so that the heritage value of the older buildings is maintained in good condition for the benefit of current and future generations. However, much remains to be done especially on those vacant premises which are being left to dilapidate.

### 12.2.3 Conservation Policies

Policy **UCO 6** represents an important objective which tends to integrate conservation of individual buildings and items with the surrounding context. Whilst significant success has been achieved in the older part of Rabat to this effect, much remains to be done. Furthermore, the success of the older part of Rabat has been more due to ad hoc interventions which fortuitously turned out to be fairly successful as they adopted the guidelines set out in the policy guidance on UCA's issued by the Planning Authority in 1995. The lack of integrated approach is however evident in the lack of organisation of spaces, their relative spatial hierarchy, the difficulty to orientation in the case of a newcomer or a visitor and the very restriction promotion and site interpretation which would render the area more attractive to visitors.

In policy **UCO 7**, the focus is on the setting out of a scheduling classification hierarchy based on the relative importance of the items considered for their cultural conservation value. The system is based on a three-tier hierarchy where Grade 1 has the highest protection status and Grade 3 has the lowest protection status. All buildings and sites listed in the National Protective Inventory are graded according to **UCO 7**. The context external to the individual building of cultural importance is again given attention in policy **UCO 8** which states that permission to develop in sites adjacent to existing buildings (with an implicit and explicit reference to UCA's) will be undertaken in a manner which ensures streetscape and architectural continuity as well as considerable attention to detail on the external facades. A presumption against demolition of existing buildings in UCA's is indicated in policy **UCO 9**. Implementation of this policy has again been fairly successful in Gozo. In policy **UCO 10**, attention is paid to maintaining a traditional skyline. This particular policy has been rather problematic to implement in Gozo as most of the adverse impacts on the skyline do not normally originate from proposals within UCA's. A particular problem in Gozo lies with development on the edge of ridges. This kind of development has had verse adverse effect, for example, on the traditional skyline of parts of *Xaghra* and *Zebbug*. (See **Section 4.3.5**)

Policy **UCO 11** is not directed at buildings in UCA's but rather at buildings in open countryside. The sensitive conversion of farmhouses has been undertaken in many areas of Gozo, however most have been put to tourism related and residential uses rather than the preferred use indicated by **UCO 11**; ie. to complement public access to the countryside.

The setting up of a land tribunal and trust is indicated in policy **UCO 12**. This trust was earmarked to provide additional financial assistance to UCA related enhancement initiatives. Unfortunately, the mechanisms to established a land tribunal and trust were not set in motion in the period since the approval of the Structure Plan in 1992. Policy **UCO 13** reiterates the need for an integrated approach to urban conservation through control or positive intervention. It is believed that this policy can easily be integrated in other **UCO** policies.

### 12.2.4 Traffic in UCA's

Urban Conservation Areas (UCA's) have particular problems with vehicular circulation by virtue of the layout of the street patterns, their width and their alignment. Parking problem are almost inherent to densely populated UCA's and this problem is exacerbated by the very high car ownership rate in the Maltese Islands. Policy **UCO 14** indicates that particular attention should be paid to traffic management in UCA's. However, the proliferation of cars and garages and the

lack of adequate parking facilities have resulted in major circulation flows especially during the peak hours. In Gozo, the most problematic areas occur in *Rabat* and *Ghajnsielem*. A problem which merits special attention is circulation through *Rabat*. The road network in Gozo is laid in such a manner that traffic originating on the eastern part of Gozo has a good chance of passing through *Rabat* to reach areas on the western part of Gozo. The local Plan team together with the Transport Unit of the Planning Authority and other agencies have undertaken a number of meetings and studies to address this problem (refer to **Chapter 6**)

#### 12.2.5 Telecommunications Equipment

Although policy **UCO 15** indicates that permission to erect telecomms equipment will only be given if antennae are hidden from view, this is a contradiction since with terrestrial communication, antennae need to be located in the highest and most visible location. The situation is a little different with satellite dishes. However, in spite of a dramatic increase in satellite dish ownership, the main adverse impact results from the proliferation of television and terrestrial communication antennae. Unfortunately, the Maltese Development Control system does not regulate TV antennae but only satellite dishes (also see **Section 8.5**).

#### 12.2.6 Promotion

Policy **UCO 16** has had mixed success. The Planning Authority has undertaken a number of initiatives to increase interest in conservation awareness. These included the publication of leaflets, articles and programmes on the media, schemes to assist in heritage upkeep, promotion of world heritage site designation, public lectures and through development control. As a result, the quality of development in urban conservation areas has registered a noticeable improvement. However, much remains to be done.

#### 12.2.7 Heritage Trust

Whilst the objective to set up a heritage trust is highly commendable, this objective has not to date been achieved. Unfortunately, Government agencies and local Non-Governmental Organisations (NGO's) are often slow to co-ordinate efforts and seem to prefer to operate in isolation from each other rather than uniting forces to achieve synergistic benefits. Thus, policy **UCO 17**, which indicates the establishment of a heritage trust, has not been implemented.

#### 12.2.8 Conservation Pilot Project

Policy **UCO 18** indicates that government should fund an early pilot project of urban rehabilitation in one of the smaller UCA's. Although ad hoc financing schemes, especially through Local Councils, were implemented, most of the schemes were not of a large enough scale and not integrated in a manner to qualify as exemplary pilot projects upon which future larger and more ambitious projects would be based.

### 12.3 Issues

#### 12.3.1 General Situation

Issues related to urban conservation are many and varied. Most of the issues are interlinked and interdependent and this increases the complexity of the problem. In common with mainland Malta, there are a number of planning problems with urban conservation areas. The most relevant problem is one of coupling the needs of modern life with those of decades or even

centuries ago. There are considerable problems relating to access and parking, internal planimetry, rising damp, proximity to neighbours, structural condition, size of tenement and ownership of tenement. These factors, coupled to issues highlighted in **Section 5.3** of this report, are contributing to the vacant dwelling problem in Urban Conservation Areas (UCA's). To complicate matters, whilst it is possible to rehabilitate dwellings successfully to meet modern requirements, these interventions are usually much more expensive than constructing a new building and maintenance problems are normally correspondingly attractive.

However not all is gloom and doom as far as UCA's are concerned. Older houses tend to have more character than modern houses and their internal and external architecture is usually more articulate and interesting than that of more modern counterparts. The urban context in which these houses are set are usually richer than that of the more recently developed urban areas. Older buildings tend to have superior thermal response characteristics making them cooler in summer and warmer in winter. Consequently, heating and cooling bills are contained. In many cases, older buildings have a courtyard and a small garden. Wells, which provide an alternative source of water, are also often found in the older houses as are underground cellars. Conversion of an old property is a challenge which requires considerable dedication, effort and expense but if tastefully done, the results can be indeed very rewarding. These results are already being appreciated through the considerable request for houses of character or residential farmhouses in Gozo.

### 12.3.2 Planning Issues

There are instances where various individuals and agencies<sup>115</sup>, have complained that the Planning Authority is rather rigid when issuing permits in UCA's. Examples are mentioned whereby facades, which were literally crumbling away, were directed to be retained, where impractical internal layouts were deemed to be kept and where minor extensions or modifications to rather unimpressive facades were withheld through planning permission conditions. Whilst it is understood that some of these complaints may be exaggerated or unjustified, it is clear that there is more room for flexibility especially where the architectural, cultural, historical or planimetric quality of the built structure is representative and widespread rather than exceptional. The main problems perceived are that there is still a lack of appreciation towards the high value of Gozitan historic centres and that there is still lack of imaginative design to complement existing streetscapes and architecture. These shortcomings can be coupled to a lack of planning flexibility.

Another issue that was raised was the lack of differentiation (when it comes to planning permission) between the quality of outstanding building and streetscapes and rather ordinary buildings and features. Whilst it was acknowledged that even the so called "ordinary" buildings/streetscapes may have features worthy of preservation, it is not considered reasonable to include these latter buildings in the same policy regimes as churches, palaces and other such important buildings. Therefore, a hierarchy of relative importance was indicated by agencies such as local councils.

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<sup>115</sup> Note: meetings with Local Councils have indicated that (in certain instances) that there are areas where the character of the streetscapes is relatively modern, yet these streets have been indicated to form part of the village core.

A meeting with the Heritage Advisory Committee of the Planning Authority highlighted the issue of linking delineated Urban Conservation Areas with the policy context associated with the germane area. Thus, whilst it was deemed acceptable to designate Urban Conservation Areas (UCA's) in rural areas in order to provide a context for the monument or area being protected, it was agreed that there should be separate policy sets covering the relevant urban and rural areas under the same UCA designation.

Other internal discussions within the Planning Directorate revealed that the existing UCA boundaries in Gozo merited a revision in view problems of consistency with mainland Malta especially with respect to the relationship between development scheme boundaries and UCA boundaries.

### 12.3.3 Urban Regeneration in UCA's

Whilst there is a stated general agreement amongst the powers of the country that there is much to be gained from conserving the very rich cultural heritage of the Maltese Islands, much less seems to materialise in terms of action. There is nevertheless still a considerable proportion of Maltese society which does not as yet appreciate the value of cultural conservation and therefore the benefits of achieving this objective through urban regeneration.

Some of the problems associated with UCA's have already been highlighted in **Sections 5.3 and 13.3.1**. The net effect is that a large number of dwellings in UCA's are being left to dilapidate and remain vacant, and this when there is a demand for additional residential dwellings. It is therefore clear that this very substantial problem deserves to be given great attention.

There are a number of measures that may be considered to reinvigorate urban life in the decaying Gozitan centres. Given the complexity of the problem, none are easy to implement and all possible solutions require considerable resources, effort and commitment in order to materialise. Therefore the principal goal of achieving effective urban regeneration is to stimulate the necessary commitment so that the task is eventually implemented. It is only then that the necessary effort and resources can be summoned so that the envisaged interventions take place.

The best form of mobilisation is education of the local population. In this way, appreciation of heritage is fostered and this motivates initiatives towards conservation. Apart from appreciation, lessons in the importance of communication, integrated approaches, research and monitoring need to be communicated. Otherwise, actions could be misdirected and more harm than benefit would result. The educational process also needs to target different age groups and people with different socio-economic backgrounds. Special emphasis needs to be made on the education of the younger generation. The educational approach should include a thorough understanding of the local culture and be adapted to take into account local cultural traits. Although a good educational programme is the most effective tool towards conservation, unfortunately it is also the most long term and the effort needs to be continuously maintained and upgraded. The benefits usually appear after a generation rather than after a number of months or years.

Economic instruments are also important tools in urban conservation through regeneration. These could be many and varied but could include grants to promote good urban regeneration projects, tax exemptions, soft loans, international assistance, supply of labour and subsidised or

free services, lease or selling of land under more favourable conditions, free or subsidised promotion of the enterprise and other such economic benefits. These incentives should be intimately coupled with conditions of integrated approaches, planning permission and local community involvement. Economic instruments are normally very effective in promoting urban regeneration and results can be achieved in a relatively short period of time. In such instances, there is usually great dependence on public sector involvement and well-guided private entrepreneurship.

Planning instruments also play a very important role in urban regeneration. Development briefs are particularly useful when a large area has a single or a limited number of owners. Planning guidance and regulation directs development to appropriate areas. Planning direction should be resolved but not inflexible as socio-economic situations are rather dynamic and planning has to be correspondingly responsive. The definition of Action Areas together with planning guidelines on what is acceptable in such areas gives entrepreneurs direction on possibilities for development and thus reduces uncertainty in terms of development related risks.

Legal instruments also play an important role in rehabilitation of urban conservation areas. A number of legal stumbling blocks have already mentioned as impeding the development of potentially available urban areas (see **Sections 5.3.3 and 5.3.4**). These include inheritance related legislation, rent legislation, sanitation related legislation (in need of dire updating) and even certain aspects of planning related legislation. On this last point, the fact that the more sensitive nature of UCA's deems that planning legislation imposes tighter control, has adverse implications in terms of unnecessary delays for relatively minor works and limited flexibility.

## 12.4 Policy Approach

### 12.4.1 General

It is clear that urban regeneration of the UCA's in Gozo should be high on the planning priority agenda. The main reason is that these areas represent a very rich capital in terms of cultural heritage and potential space to accommodate residential, commercial, social and recreational uses. The Island of Gozo simply cannot afford to have a situation whereby a significant proportion of its built environment is left to deteriorate. This issue becomes even more alarming when there is a considerable demand for extension of development schemes.

Wide orthogonal carriageways with non-imaginative residential and administrative architecture is found in many areas in the Maltese Islands and the rest of the world. On the other hand, the existing Urban Conservation Areas in Gozo have resulted from the historical pursuits of a culture which interacted with its natural environment as well as its socio-economic requirements to construct a place which is highly desirable to inhabit. The endeavours of the current society should only complement the existing rich cultural heritage by maintaining a good sense of continuity with the past as a springboard for future initiatives.

Re-utilisation of traditional architecture has already borne fruit in Gozo. This is evidenced by the heavy demand for tastefully converted houses of character and farmhouses which have in recent years brought prosperity to their owners. It must be borne in mind that until thirty years ago, farmhouses were perceived in a derogatory manner. Things take time to change and there is

no reason why the same positive outcome should not occur with respect to Urban Conservation Area regeneration.

#### 12.4.2 Scenarios

It is very difficult to predict the outcome of what will eventually happen to cultural heritage within areas earmarked for development. The main difficulty lies with the multitude of actively interacting factors which render precise forecasting a daunting task. However, three basic scenarios can be envisaged for urban conservation in Gozo namely:

a) **Disregard present Urban Conservation Areas and apply the same policies as those for the rest of the existing development schemes.**

**IMPLICATIONS:** - If all other planning considerations are observed and if the areas are not overdeveloped, then there would be more individual freedom in the design of the individual residential or commercial units. However this freedom comes at a price. First, in the absence of a comprehensive remodelling of the UCA's, the existing street patterns would still represent a constraint to circulation. Thus for example, in most cases it would be impractical to introduce houses with garages as the narrow width would preclude manoeuvring and would entail a no parking stretch on the opposite side of the carriageway, thereby further restricting parking and circulation. Additionally, further deterioration of the UCA would lower the urban and architectural qualities of the area and render it less desirable to commute through and visit. The Gozitan experience would thus become less attractive. Furthermore, precious cultural heritage, which is an essential component of any culture's development and reinforces its identity, is lost forever. There are also international obligations to safeguard cultural heritage.

b) **Continue to apply current policies within UCA's**

**IMPLICATIONS:** - The current planning policy regime has been fairly effective in protecting Urban Conservation Areas from falling victim to uncontrolled building practices. However, there are a number of problems that if not addressed, would be likely not to encourage the maximisation of the existing built capital which is currently either not occupied or is only partially utilized. Moreover, the blanket policies which apply throughout the existing Gozitan UCA's, in certain instances, could preclude certain forms of sensitive alterations and thus a large number of urban dwellings would remain unoccupied. This phenomenon most certainly contributes in part to the pressure to extend development schemes.

c) **Modify the existing policies to allow for greater development flexibility whilst doing this in a sensitive manner which strives to enhance traditional characteristics in UCA's.**

**IMPLICATIONS:** - There is definite scope for some of the existing UCA policies to be relaxed in an appropriate manner in certain areas. There is also ample scope to introduce a number of incentives to encourage people to occupy existing vacant buildings in UCA's. This would potentially encourage some people to consider occupying existing dilapidated or under-utilised buildings in UCA's. If the strictest policies and their observance are restricted to the more sensitive buildings and

streetscapes, then there is more likelihood of the rest of the building fabric becoming inhabited or otherwise more fully utilised. Additionally, there are many positive interventions that can be undertaken in UCA's to enhance their urban quality. Examples include the maintenance of dilapidated facades, the removal of obtrusive features on the facades (eg. dangling cables), the application of appropriate apertures, the instalment of adequate traditionally styled luminaires, the introduction of street furniture (especially in piazzas or other urban spaces), the introduction of carefully designed and appropriate soft landscaping and so forth. The expenditure entailed is likely to be recouped through the attraction of more upmarket visitors, some of whom may decide to become permanent residents of the UCA. If urban spaces are given the requisite attention, this could encourage more outdoor social interaction, especially during the warmer months.

### 12.4.3 Objectives and Strategy

The main objectives intended to address rural conservation issues in Gozo are indicated to:

- Safeguard existing built heritage for use and enjoyment by current and future generations
- Promote the use of existing under-utilised built heritage in UCA's.
- Create more attractive traditional urban spaces through the upgrading of existing open spaces, the addition of appropriate hard and soft landscaping and the removal of degrading features from the townscape.
- Create pedestrian areas where appropriate.
- Discourage over-development and/or architecture which discords with the surrounding urban texture.
- Encourage the continued protection of the traditional Gozitan landmarks especially ecclesiastic buildings, stately houses and the more architecturally meritorious buildings and streetscapes.
- Give special attention to military architecture with special emphasis on the *Cittadella*, *Fort Chambray*, *Comino Tower* and *barracks*, *Qala* and *Comino redoubts*, *Gordan barracks* and the various watch towers.
- Create a hierarchy of areas of protection policies intended to promote more development flexibility whilst conserving the more important aspects of streetscapes in UCA's.
- Encourage the wider promotion of Gozitan urban heritage to locals and visitors.

The objectives of rehabilitation of UCA's are basically to retain as much as possible of the existing built urban fabric in order that it can be enjoyed and appreciated by the current and future generations. Conservation and rehabilitation however inherently imply that some change must occur as conservation can only be successful if the item or area being conserved is fully utilised. Restoration and sensitive conversion programmes, whilst inherently positive, only constitute a minor component of an urban conservation rehabilitation programme. The major effort should be directed to render the spaces enjoyable, attractive and financially stimulating through the attraction of investment as well as a resident or transient population. The foregoing notwithstanding, investment should not be used as an excuse to demolish the existing conservation area fabric in the name of "progress". There are countless examples, even from Mediterranean countries, where intelligent and imaginative use of existing built fabric has resulted in very desirable urban

spaces which attract residents, tourists and investments<sup>116</sup>. Gozo is well endowed with cultural heritage and it must ensure that this heritage is well utilised to the benefit of present and future local and visiting communities.

To this effect, special attention should be given to the *Cittadella*, which, by virtue of its location within the landscape as well as its architectural and historical significance, is synonymous with the Gozitan capital. At present, this site is highly under-utilised and siting of attractions can serve to revitalise this heritage to transform it into a living monument.

The main thrust behind policy direction related to UCA regeneration is intended to increase upon the existing flexibility in terms of restrictions to development within UCA's. To this effect, there should be a hierarchy of importance established within the existing or proposed urban conservation areas. There should also be a schedule of permissible minor development which would qualify under the current GDO system provided that strict adherence to the schedule is maintained. Service providers should be encouraged to intensify collaboration with central government and the local councils in order to reduce unsightliness created by services. Preference should be given to underground common ducting. The ultimate aim would be to make it easier for developers to utilise the heritage within the more important centres provided that certain pre-established guidelines are observed. In the less important areas, it shall be possible to demolish even existing facades provided that the replacement fits into the streetscape and the architecture of the external facades make a positive contribution rather than detract from the quality of the streetscape.

It is of fundamental importance that any interventions that take place are undertaken within the context of an action plan which is endorsed by all the main parties concerned and through a programme which is fully compatible with strategic and local planning policies. The plan should also be implemented after an extensive public consultation exercise.

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<sup>116</sup> A number of such instances were recounted from the personal experience of Mr. Andre' Zammit A&CE, during a meeting with the Local Plan team. These experiences are confirmed through the Local Plan team's experiences as well as planning literature.

## 13. RURAL CONSERVATION

### 13.1 Introduction

The Islands of Gozo and Comino have both been designated as Rural Conservation Areas (RCA's) by the current Structure Plan. In effect this translates into development being directed to be undertaken in a more sensitive manner and where possible restricted to areas designated for urban development. The policy of containment has been fairly successful for both islands in the sense that the urban sprawl that was taking place in the eighties and early nineties has been contained. However, this policy has also translated into increased pressure to intensify development in the newer areas (eg. increased height limitation). This in turn implied that since newer areas normally lie at the periphery of the settlement, the visual impact of development has been correspondingly greater.

Whilst the current Structure Plan has indicated a number of measures to be implemented in order to achieve a better rural environment in Gozo, for a number of reasons, most of these measures have not to date been implemented. The main problem of rural conservation in Gozo is not mainly due to a policy vacuum or a lack of strategic direction but is rather one of implementation. Whilst there have been attempts to operate management plans in for example *Ta' Cenc*, *Qawra/Dwejra* and *Ramla*, the results have yet to be seen. The closest in the run appears to be the *Ramla* area which has in mid-2000 benefited from EU LIFE project funds to operate a management plan in the area<sup>117</sup>. The lack of any form of rural management in Gozo and Comino is not only felt in the case of the environmentally more sensitive areas but also for the rest of the non-developed. Given that the landscape of Gozo is mainly moulded through human intervention, it is imperative that this same human intervention is directed to improve upon the existing environmental qualities. Rural management in Gozo and Comino also needs the integrated approach of all the public and private agencies involved. Statutory protection of tracts of territory without the institutional and administrative back-up to tangibly promote human activities which enhance the quality of the rural environment and without credible and effective measures to discourage the less desirable ones, is simply not enough. It is therefore fundamental to promote the concept of integrated rural management for Gozo whilst at the same time ensuring that the smaller area management projects such as the *Ramla* management programme, take-off so that wider scale initiatives are encouraged through the positive results emerging from the pilot projects.

### 13.2 Policy Context

#### 13.2.1 Introduction

The main guide to Rural Conservation Policy is found in the Structure Plan for the Maltese Islands. This section is one of the most extensive in the current Structure Plan with one fifth of the policies being dedicated to rural conservation. Most of the policies are equally applicable to all the Islands of the archipelago whilst some are specific to the Island of Gozo, Comino or the other minor islands. Most of the policies are based on a blanket prohibition of urbanisation outside

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<sup>117</sup> This has been confirmed through a meeting with Dr. Rudolf Ragonesi, representing the Gaia Foundation

existing and planned urban areas as designated in the Structure Plan. RCO policies are also designed to prevent the development of any structures or activities in rural areas other than those legitimate and natural to them. The Structure Plan also states that the designation of Rural Conservation Areas not only reinforces these protective constraints but also provides the physical context and institutional means of positively channelling effort and investment into the enhancement of the natural features and activities taking place within them.

### 13.2.2 **RCA Designation**

Policy **RCO 1** indicates the various designations to be adopted within Rural Conservation Areas and the criteria to be used in their designation. Policy **RCO 2** allows certain kinds of traditional agricultural development in Rural Conservation Areas. Policy **RCO 3** indicates that the Local Plans will precisely delineate various designated sub-areas and will also indicate the relevant specific protection and enhancement measures. Furthermore, the same policy directs towards the identification of mineral resources and the resolution of conflicts in rural areas.

### 13.2.3 **Scenic Value**

There are three policies that relate to scenic value in rural conservation areas. **RCO 4** indicates that certain types of structures which are incompatible with various aspects of the Maltese rural landscape would not be permitted. **RCO 5** relates to the mitigation of visual impact arising from the provision of infrastructural services whilst **RCO 6** encourages close liaison with the Ministry for Agriculture and the then Secretariat for the Environment in order to undertake various rural conservation management schemes. All these policies have to a certain degree been implemented save for **RCO 6** where the level of interdepartmental liaison has not materialised to the desired degree. Initiatives in the countryside still remain based on a rather ad hoc fashion although there are signs that the situation has improved marginally since the beginning of the 1990's. Some improvement has been registered in the quality of certain kinds of rural development especially when this is intended for residential purposes. Conversely, the scenic quality of cultivated fields and of animal farms has on the whole been degraded.

### 13.2.4 **Agriculture**

Policies **RCO 7** to **RCO 9** relate mainly to the desired planning relationship between agriculture and scenic, ecological, archaeological and mineral interests within the local plan area. At the time of writing, no Areas of Agricultural Value have been designated. The designation of Areas of Agricultural Value in the Structure Plan is intended primarily as an instrument of protection and as a statement of the importance of such areas in the resolution of conflicts with scenic, ecological, archaeological, and mineral interests in the relevant Local Plan areas. It is assumed that conflict between scenic, ecological, and archaeological interests will be rare, but certain agricultural processes can adversely affect all three. Therefore, notwithstanding the Planning Authority's support and protection of agricultural interests, it is the intention, in conjunction with the Ministry of Agriculture and individual farmers, to seek ways in which these other interests can be protected without unduly constraining efficient agricultural practices. The local plan team has not encountered evidence of individual cultivators being asked to produce detailed reports on the relationship between their cultivation proposals and the surrounding natural and cultural heritage.

### 13.2.5 Ecology

Ecology is given particular attention in the Structure Plan. Policies **RCO 10-13** indicate in some detail how areas and sites of ecological importance qualify for protection and how they should be classified according to a four-tier system of relative importance. These policies have been extensively applied in the scheduling of areas in Malta and Gozo. Policy **RCO 13** indicates the commitment of the Planning Authority to work with the relevant agencies to protect local wildlife with special emphasis on threatened species. This policy has not been implemented although indirectly the Planning Authority designates some sites in the interest of wildlife and the wider enjoyment of such wildlife. The designation and development of National Parks is of special relevance to Gozo as Two National Parks (*Ta' Cenc* and *Qawra/Dwejra*) are specifically earmarked in policy **RCO 14**. Although considerable work has been undertaken, these areas have not to date been designated as National Parks. Furthermore, the designation as indicated in the current Structure Plan is not correct as no area in Malta can ever qualify for National parks. Actually, not even any of the UK “National Parks” actually qualify by the IUCN criteria<sup>118</sup>. These areas should be designated as “National Country Parks”. Policy **RCO 15** seeks to protect natural heritage within built-up areas.

### 13.2.6 Sandy Beaches and Dune Areas

There are three policies specifically indicated towards the protection of sandy beaches and dune areas. These are policies **RCO 16-18**. Policy **RCO 16** does not allow permanent construction on sandy beaches and advocates for their removal wherever practicable. This policy has been partially implemented at *Ramla Bay* through the relocation of the kiosks away from the dune areas. Policy **RCO 17** seeks to prevent camping on sand dunes and to restrict vehicular access by vehicles. The implementation of this policy has been problematic especially as most of the illegal activity takes place at night or during weekends when enforcement staff is practically non-operational. However, physical measures to preclude vehicular access to *Ramla Bay* has been fairly successful. The Planning Authority has also been fairly successful in implementing policy **RCO 18** by encouraging the public and the relevant agencies not to remove sand-binding vegetation and by scheduling sites where such vegetation occurs.

### 13.2.7 Rehabilitation of Degraded Habitats and Landscapes

The predominantly rural landscape of Gozo has overall undergone degradation since the enactment of the Structure Plan. Whilst policies **RCO 19-20** seek to survey degraded areas and undertake measures to rehabilitate such areas, to date efforts have only included sporadic efforts by NGO's or other agencies to undertake clean-ups of particular areas. A survey identifying degraded land on Comino has been undertaken in 1999 whilst the ecology survey for Gozo has indirectly identified some degraded land in Gozo<sup>119</sup>. Positive measures to rehabilitate landscapes have been included in small-scale efforts such as the rehabilitation of the oil-well site at *Il-Madonna Taz-Zejt at Kerzem*.

<sup>118</sup> Refer to guidelines on Protected Areas published by the IUCN

<sup>119</sup> Commissioned by the PA and forwarded to the Local Plan team late in the year 2000.

### 13.2.9 Control of Erosion

There are seven policies relating to the prevention of erosion. Policy **RCO 21** relates to development in areas prone to erosion. Given that these areas were never precisely identified, it was rather difficult to implement. Policy **RCO 22** relates to prevention of further loss of sandy beaches, sand dunes, coastal clay slopes, soil and cliff edges. There are instances where this policy has been implemented through conditions applied in major projects. In fact in the Chambray project, an area was left free from built development as the area has shown evidence of clay subsidence. However there were few initiatives to undertake positive tangible interventions to prevent erosion in natural areas.

Policy **RCO 23** indicates that scientific studies have to be undertaken where coastal defence constructions are envisaged. Where major projects were envisaged, this policy has mostly been observed but in most instances, such projects occurred in mainland Malta. **RCO 24**, which relates to transport of sand is also known to be generally observed. Positive action to repair breached rubble walls on valley sides is identified in policy **RCO 25**. Although a paper on the future of rubble walls has been approved by the Planning Authority, little tangible positive action has been undertaken in this respect although in certain areas of Gozo, rubble walls are better maintained than in most areas in Malta. In the case of **RCO 26**, it is very improbable that the Planning Authority has ever prevented anybody from removing vegetation cover from abandoned fields. On the other hand, Policy **RCO 27** which prevents the excavation of significant amounts of blue clay has been generally successful in rural areas but in urban areas this policy has actually failed especially due to the application of other Planning Authority policies which encourage the use of underground space and the provision of underground parking.

### 13.2.9 Valleys

Two very important policies are intended to protect valleys. These are **RCO 27-28**. **RCO 27** has in general been observed as in most cases, the watercourses are still not obstructed by development. Policy **RCO 29** has also been largely observed although bad practices in some valleys such as concreting of rural roads and field accesses, dumping of liquid and solid wastes, indiscriminate removal of wild vegetation and inappropriate planting have led to areas of localised degradation. A number of rubble walls holding back precious soil on the sides of valleys have been damaged through periods of intense rainfall, lack of maintenance and the deliberate removal of stones from the walls.

### 13.2.10 Trees and Afforestation

There are four **RCO** policies related to trees and afforestation. **RCO 30** gives locational criteria where afforestation projects can occur and which type of trees should be employed. Given that there were no major afforestation initiatives in Gozo during the operational period of the current Structure Plan, this policy was not implemented. However, in development control<sup>120</sup> and in the planting of small numbers of trees<sup>121</sup> in rural areas, considerable attention was paid to the planting of indigenous and archaeophytic trees in accordance with policies **RCO 31** and **RCO 32**. No tree preservation orders have yet been issued for any area in Gozo or Comino.

<sup>120</sup> Through conditions in planning permits.

<sup>121</sup> By the Department of Agriculture or the Department for the Protection of the Environment.

### 13.2.11 Minor Islands

Policy **RCO 34**, which indicates a presumption against development on indicated minor islands has been observed. In the case of Gozo and Comino, this policy applies to *Cominotto*, Rocks in the *Blue Lagoon Area*, *Gebla tal-Halfa*, *Il-Hnejja*, *Tac-Cawl* Rock, *Fessej* Rock and *Fungus* Rock (*il-Gebla tal-General*).

### 13.2.12 Qawra/Dwejra Area

Given the importance of *Qawra/Dwejra*, four Structure Plan policies were dedicated to the protection and management of this area. **RCO 35** indicates that the area should be declared as a National Park. This has not yet been done. Furthermore, this particular Structure Plan policy needs revision as no area in Malta qualifies for National Park status as defined by the IUCN (World Conservation Union). A term such as National Country Park would be much more appropriate (see **Section 13.2.5**). Efforts have been undertaken by the Planning Authority and other agencies to promote the *Qawra/Dwejra* area as a World Heritage Site in accordance with policy **RCO 36** but to date<sup>122</sup> such efforts have not borne fruit. Consequently, policy **RCO 37** which outlines the direction for a management authority for the park has not materialised. Policy **RCO 38** indicates that other protection status categories including Marine Protection Areas can be identified and established within the confines of the park and which could include marine as well as terrestrial areas.

### 13.2.13 Education and Research

There are five policies in the Structure Plan for the Maltese Islands which are aimed at education and research in policies **RCO 39-42**. The main aim behind these policies is to increase awareness on the importance of education as an effective vehicle to promote conservation. The policies also recognise the importance of interpretation and ancillary facilities to this effect, in order to further promote education on natural heritage conservation. Over the years, a number of initiatives have been undertaken by the Planning Authority, the Department for the Protection of the Environment, the Department of Agriculture, the Department of Education, the University of Malta, the Ministry for Gozo, Local Councils, Local Media, other public agencies, NGO's and individuals. However, most of these initiatives were disjointed, ad hoc and sometimes the information conveyed was misguided. It is fundamental that given the limited expertise and resources, initiatives related to environmental education should be well co-ordinated and the material should be conveyed to identified target groups in the most effective manner. Extensive use should be made of modern media such as TV and the Internet and local or external funding<sup>123</sup> should be sought to promote such initiatives.

### 13.2.14 Archaeology

Strictly speaking, archaeology should not be classified under the heading of rural conservation as whilst the majority of archaeological remains are found within Rural Conservation Areas, there are a good number of remains which are found in urban areas. For example in the case of Gozo, there are significant important remains in areas such as *Rabat* and *Xaghra* which lie within built-up areas. The Structure Plan for the Maltese Islands identifies seven policies related to archaeology. Policy **ARC 1** obliges local plans to designate and delineate areas and sites of

<sup>122</sup> Referring to early year 2001

<sup>123</sup> There are considerable EU funds that can be explored to this effect.

archaeological importance. Policy **ARC 2** proceeds to establish a hierarchy of importance to the various archaeological areas and sites with Class A being the most important and class D being the least important. In the case of the most important archaeological remains, such as *Ggantija* at *Xaghra*, a buffer zone of at least 100m. around the perimeter of the site is imposed by policy **ARC 2**. A number of important archaeological areas and sites have already been scheduled and it is envisaged that these scheduled areas are adopted by the local plan for Gozo and Comino.

Policy **ARC 3** is intended to protect ancient monuments and sites from development through development control. This policy has been found to be quite effective even in the case of requests for planning permission in existing buildings which lie within archaeological buffer zones. *Ggantija* is specifically indicated in policy **ARC 4** as qualifying for scheduling as an Area of Archaeological importance and in fact this area has been scheduled to this effect. **ARC 5** is not relevant to Gozo as it makes specific reference to sites in Malta. Policy **ARC 6** was intended to promote the National Protective Inventory in the interim period between the adoption of the Structure plan and the adoption of local plans. This policy directs towards scheduling of important archaeological sites according to criteria established in policy **ARC 2**. Policy **RCO 7** obliges the Planning Authority to adopt and maintain the National Protective inventory and to upgrade it as necessary. This policy is being implemented.

#### 13.2.15 **Marine Conservation Areas**

For the first time in the history of Maltese Planning, areas beyond the foreshore were included within a planning policy context. Thirteen policies were indicated to this effect. A number of potential candidate sites, five of which fall within the Gozo and Comino local plan area, have been identified in policy **MCO 1**. **MCO 2** indicates that marine archaeology should be integrated within Marine Conservation Areas whilst policy **MCO 3** indicates that a Geographical Information Systems (GIS) based database will be established for the Maltese coastline and territorial waters. Policy **MCO 4**, which indicates collaboration between the Secretariat for the Environment and the Planning Authority to undertake a survey of infralittoral ecosystems has not been implemented. However, infralittoral surveys of small areas in Gozo have been undertaken.

Policies **MCO 5-13** indicate the qualifying and management criteria for the establishment and maintenance of marine conservation areas. To date, none of these policies have been implemented although in the case of **MCO 6** and **MCO 10**, there have been attempts by the Planning Authority to implement these policies.

#### 13.2.15 **Coastal Zone Management**

The coast of Gozo and Comino is given particular attention in policies **CZM 1-CZM 3**. **CZM 1** relates to the establishment of a coastal zone management unit. Whilst the Planning Authority has professionally staffed resources to address certain aspects of coastal zone management, the integrated approach implicitly envisaged through policy **CZM 1** has not to date materialised. **CZM 2** indicates the need for a coastal zone subject plan. The requirements set out by this policy are partially being fulfilled by the study being undertaken in the topic paper for coastal zone management required for the revision of the current Structure Plan Review.

Policy **CZM 3** is an extremely important policy given the importance of the coast and the great competition for resources that occur on or near the coast. Furthermore, it must be borne in

mind that visual and physical access to the coast represents a very important socio-economic aspect as the sea represents the only available area where human intervention is not very visible and it also provides unrestricted viewsheds till the horizon. In 1998, the Planning Authority has conducted an exercise whereby various degrees of access (physical and scenic) were delineated for the Maltese Islands. However to date, this delineation has not been approved.

### 13.3 Areas and Sites of High Landscape Value

The still relatively unspoilt landscape of Gozo, Comino and the surrounding smaller islets give the Islands a character which is especially appealing to individuals who are after a relaxing atmosphere, a tranquil setting and a get away from it all feeling. The still predominantly traditional agricultural practices enhance the qualities of the natural landscape.

The enhancement of the scenic quality of Gozo and Comino depends on three major fundamental principles. The first is statutory protection of land, the second is the implementation of an approved management plan and the third is to instil a sense of appreciation in the community making use of the area and the visitors who visit the same area. If any one of these basic “ingredients” is absent, successful management of the rural scenic qualities would be seriously hampered. Statutory protection of land can be achieved through already existing “tools” such as scheduling and Conservation orders. The implementation of an approved management plan needs to be undertaken in steps in the sense that the concept should ideally be implemented on small and more manageable areas and when the results start to be visibly appreciated, the concept would be extended to a wider area. Management plans should have the widest possible public involvement, in order to ensure ownership of the plan by the community. Furthermore, implementation should involve prominent members of the local community and the plan should be as much as possible self-financing. The instilling of a sense of appreciation is the most difficult objective to achieve but if achieved, the results are the most effective and rewarding. The exercise inevitably has to take place over a wide time horizon and needs to address all sectors of society. The point of departure is to understand the local values and culture and mould an “appreciation programme” by translating the benefits of appreciation in terms of the said local values and culture with the aim of gradually modifying them. Educational campaigns using the most effective media are indispensable to this effect.

Areas of High Landscape Value are easy to perceive but very difficult to delineate and classify. A hierarchy of relative scenic importance is indispensable as the more sensitive areas need a more rigorous approach whilst the less sensitive areas can have a greater flexibility in approach to development. In general, the areas which command the widest areas of visual influence and which have “access” to coastal and inter-island scenery are the areas with the highest scenic value. Views of important landmarks such as the *Cittadella* or other cultural landmarks also make considerable contribution to the scenic value of an area. It is also very important to pay special attention to areas committed for development, especially development lying at the fringe of areas designated for development. Given that these areas demarcate the transition between urban and rural areas, softening measures should be adopted to achieve a gradual aesthetic transition. Similarly, special attention should also be paid to development which lies at the edge of steep slopes or escarpments.

In line with the Council of Europe Landscape Convention<sup>124</sup>, the landscape evaluation should not be limited to either urban or rural areas but an integrated approach should be adopted. The cultural and the natural character of densely populated areas are intimately interlinked and the relationship between these two fundamental components should be continuously been borne in mind. The value of the land-water body interface should also be taken into account in any evaluation.

### 13.4 Areas and Sites of Agricultural Importance

Agriculture is the largest land-user in Gozo. Apart from the socio-economic benefits that agriculture entails, there are also scenic and ecological benefits. Agricultural land should also be classified in terms of a relative scale of productive importance, the main reason being that some forms of development inevitably need to take place on agricultural land (eg. farms, stores, greenhouses etc.). In the case of built development, it is important to ensure that the most productive is not taken out of cultivation when lesser quality agricultural land exists in the vicinity.

There are many factors that effect productivity. These include type of soil, depth of soil, topography, extent of cultivated land, micro-climate, type of product being cultivated, water availability, access and many others. In the Maltese Islands, human intervention plays a very important role in cultivation and these efforts increase productivity by artificially supplementing the necessary inputs to enhance cultivation or by reducing the adverse elements. In general, the greater the human effort to keep a patch of land in cultivation, the lesser the quality of agricultural land for cultivation purposes. To this effect, slope plays a very significant role as high gradients render access more difficult and increase the likelihood of erosion (this entailing the building of erosion reducing measures such as rubble walls). Higher human intervention also translates to higher costs and therefore less competitiveness in the market. Consequently, agriculture on steep terrain is less attractive and there is a tendency for such land to be abandoned. Ironically, from a scenic point of view, traditionally cultivated land on sloping hills makes a very positive scenic contribution to the visual quality of an area as the moulding of agricultural land on a rolling topography imparts a very pleasant effect.

A report commissioned by the Planning Authority in 1999 has indicated that agricultural productivity of some kind is achieved on most non-urban land in Gozo. The least productive areas are found in the vicinity of the coastal areas and in the vicinity of the higher sloping ground near some of the mesas in Gozo. There are also stretches of garrigue, including areas such as *Ta' Cenc*, *il-Qortin ta' Esopu* and *il-Qortin Tan-Nadur*, which are not productive. Other areas such as the limestone pavements at the top of some mesas such as *Tal-Gurdan*, *Ta' Kuljat*, *Ghajn Ghabdul* and others are similarly non-productive. Areas near operational quarries such as those in the *Qawra/Dwejra* area and in the *Ghar-Dorf* area (l/o Qala) tend to be abandoned by virtue of the adverse impacts of nearby quarrying activity. Another matter that has featured in the Gozo and Comino study on agriculture is that the land due west of *Rabat* is less intensively cultivated and more prone to abandonment than the agricultural land due east of *Rabat*. There are only traces of cultivated land on Comino, these lying mostly due south of *Santa Marija Bay*. However, there are scattered pockets of cultivated areas elsewhere on the island.

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<sup>124</sup> Malta signed the Convention in October 2000.

### 13.5 Areas and Sites of Ecological Importance

Although Gozo has seen human intervention for the past seven millennia, the island still offers refuge to a large number of species, some of which are endemic to Gozo or Comino. In view of the international importance of these species, it is imperative that their habitats are protected. Apart from the local legal and moral obligation to protect threatened species, there are also international conventions to which Malta is a signatory member. These obligations bind the Maltese nation to act as a custodian on behalf of the international community to protect natural heritage of international natural significance. The protection of areas of ecological importance provides additional benefits linked to awareness of national identity, education, scientific research and recreation.

Extensive research has been conducted on various areas of Gozo and knowledge of the various terrestrial species and their habitats is being gradually accumulated. The most researched areas are *Ta' Cenc*, *Qawra/ Dwejra* area and Comino. Other areas such as *Il-Qortin Ta' Isopu* have been studied as part of an EIA requirement whilst areas such as *ir-Ramla l-Hamra* or *Wied ix-Xlendi* have been studied in conjunction with their designation as areas or sites of ecological importance. A comprehensive ecological survey has been commissioned in 1999 by the Planning Authority to study the ecology of Gozo and Comino. It is envisaged that the Local Plan for Gozo and Comino adapts the guidance for designation and management included in the said ecological survey.

### 13.6 Areas and Sites of Scientific Importance

There are two main types of natural heritage which are considered for the purposes of statutory protection. Biotic heritage is generally protected through designation of Areas and sites of Ecological Importance. Non-biotic heritage is normally statutorily protected through Areas and Sites of Scientific interest.

The Islands of Gozo and Comino have a considerable wealth of geo-morphological and palaeontological heritage. Features include caves (some with stalagmites and stalactites), wadis, faults, stratigraphic sequences, subsidence structures, blowholes and many other features associated with a karst environment. These features, together with fossils and minerals embedded in the various strata, hold the key to the understanding of the various geo-tectonic processes that helped to shape the Central Mediterranean area. Palaeontology also gives important clues to the age of the rocks and to the ecology of the Central Mediterranean region through a time span of millions of years when the extant rock layers were still being deposited in a sub-marine environment.

The geological situation in Gozo and Comino is not static. The various subsidence structures that are especially prevalent near the western coast of Gozo are indicative of geological processes which have shaped sections of this part of the Gozitan coast. The boulder-strewn areas of parts of the north eastern coast of Gozo bear evidence to undercutting processes which have enabled large Coralline limestone slabs to break off onto the underlying clay. Natural forces have not yet ceased to operate on the islands. During the past 30 years, huge rock slabs have detached been detached from the southeastern cliffs of Comino, leaving visible white rock scars on the cliff edge. Occasional landslips and tectonic movements are also reported from time to time. These

forces are also relevant from a planning point of view as some areas are more geologically unstable than others and hence any built development on such areas constitutes an additional risk.

Man-made intervention can also pose threats to features of scientific importance. Features such as the *Zerka Window*, an orthogonal natural rock arch at *Qawra* (due west of *San Lawrenz*) is being subject both to quarrying operations nearby as well as considerable erosion forces of high waves and the damaging effect of saline water on porous rock. The horizontal rock slab of this rock arch is already showing deep cracks at a number of points indicating that this slab will eventually fall into the underlying water. The land overlying the cave known as *L-Ghar ta' Xerri* at *Xaghra* has been redeveloped and in this case the Planning Authority has taken steps to ensure that the features of this cave are protected. Unfortunately, various stalactites and stalagmites in the cave had already been damaged by the many visitors who have for years visited the cave.

### 13.7 Rural Conservation in Gozo

As indicated in **Section 14.3**, statutory protection on its own is not enough to ensure the continued protection of rural and natural areas on Gozo and Comino. Whilst the Planning Authority can play a very important role in the identification and statutory protection of rural areas, the role of public agencies, private agencies, the local community and visitors, is also very important. The whole community must be committed to ensure that whilst development which is not compatible with rural conservation is either re-directed elsewhere or not allowed to occur, positive action should be taken to encourage those aspects of rural development which enhance the rural landscape<sup>125</sup>. In all cases there are instances where certain forms of obnoxious development has to be accommodated in rural areas. In such cases it is important to ensure that the intervention is as much as possible reversible and the enforceable mitigation measures are employed both during the operational stages as well as during the post-operational stage.

A very important component of rural conservation is management whereby a lot of intervention takes place but this is done so sensitively that after a relatively short period of time, the intervention seems to be almost totally natural. Examples include sensitive planting of appropriate species in carefully selected areas. Trees take a fairly long time to grow and concrete results are often appreciated more than thirty years after the intervention. However, by such time, the afforested area would become a semi-natural treed areas. Positive intervention also includes the proper maintenance of traditional rubble walls, the rehabilitation of degraded habitats, the creation and maintenance of footpaths, the provision of visually unobtrusive small scale local car parks, the bringing of abandoned fields back into traditional cultivation, the erection of small stores in traditional random rubble materials and a myriad of other interventions which together interact to create a better rural landscape.

Even if all the interventions are successful, it is important to use the interventions to increase the importance of rural awareness especially through creative interpretation and visitor management. Unobtrusive signs tell untold stories and guides could flavour the experience whilst providing an additional source of revenue. Farmers may give tourists the experience of harvesting or animal rearing in return for an additional helping hand. Efforts may be undertaken to undertake

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<sup>125</sup> This approach is consistent with the management criteria in IUCN category V objectives for Protected Landscapes.

an environmentally friendly recycling of wastes generated on the farm so that these can be effectively be recycled within the same farm or on other rural areas. If rural appreciation takes root, most of the tasks would eventually be undertaken through voluntary work which is normally both effective and cost effective. However, all the good will must be directed through a professional rural management plan which sets out the objectives, procures the resources, implements the objectives and monitors progress. Undirected or misdirected or disjointed efforts are both wasteful of resources and can potentially lead to more retrogression than benefit.

### 13.8 Marine Conservation Areas

Gozo, Comino and the surrounding islets are dominated by an almost omnipresent feature whose influence is felt to varying degrees on the whole territory. The sea is visible from practically all points on the islets, from most of Comino and from large areas in Gozo. Moist air brings refreshing breezes in summer and intensifies the perception of cold in winter. Salt laden air accelerates the corrosion of stonework and metal. The sea is also the main medium for physical communication with the rest of the Maltese Islands and the world. In summer, coastal areas are also much sought after as providing the main venue for recreation. In other words, it is difficult to plan for land whilst not considering such an important feature as the sea.

The same principle is applicable to conservation. The importance of the scenic contribution of the sea and the importance of conserving terrestrial species and habitats have already been portrayed. It is only logical to deduce that since marine areas have ecological and scientific value of their own and maritime and land-generated human influences can have adverse effects on the natural value of these areas, then marine areas should be statutorily protected and managed on the same principles as their terrestrial counterparts. It also makes perfect sense to designate Marine Conservation Areas (MCA's) adjacent to terrestrial protected areas to that the land-sea interface continuity is maintained. The Structure Plan for the Maltese Islands has already indicated in this policy direction by proposing that the area of sea adjacent to the proposed terrestrial protected area of *Qawra/Dwejra* be considered as a candidate MCA. Similarly, the sea near *Ta' Cenc*, *Ramla* and the sea around Comino were proposed as candidate MCA's. Areas not adjacent to proposed terrestrial protected areas are also mentioned as candidate MCA's. These include the sea near *Qbajjar*, which is known for its underwater features, the area off *Mgarr ix-Xini*.

MCA designation is also intimately linked to land operations for other reasons. Fishing practices may interfere with or hinder enjoyment of the area. A sewage outfall may also hinder the enjoyment of underwater features and habitats and it could also add a health hazard. Access from land is another important consideration as diving activities often commence on land. All of the envisaged activities that occur on or under the stretch of sea designated as an MCA have to be carefully considered with a view towards the protection of the underwater habitats whilst encouraging non-destructive enjoyment of these habitats. Management of both the land protected area as well as the adjacent MCA by the same body is encouraged as it would promote better utilisation of resources and would ensure compatibility between activities on land and the sea.

## 13.9 Policy Approach

### 13.9.1 General

Rural Conservation in Gozo is of particular importance in view of rural land-use being predominant on the islands. Planning policies relating to rural conservation should not only take into account the various features which are intended to be protected but also the fact that the islands are inhabited and visited. Therefore, methods which explore the interaction between natural and anthropogenic forces should be analysed and considered in the policy formulation process. Experience in other countries has clearly demonstrated that the hands off approach is often counter-productive, especially in countries where public awareness and an effective enforcement system are not yet well developed.

The advantages of integrating and managing conservation of natural resources with human activities are several. These include:

- i) Natural resources are better appreciated when managed access is allowed and where good interpretation is available.
- ii) Better appreciation results in increased awareness and thus the risk of negative human impact is reduced.
- iii) When human interaction is well managed, economic benefits could accrued from offering a good visiting experience.
- iv) In areas where public open space is at a premium, it is important to offer additional public space rather than further restrict access.

Of course, these advantages are not without a price. Human intervention, no matter how restricted or well planned entails a degree of modification to natural processes. A badly or weakly managed natural area could be conducive to having the resources of the area being depleted, damaged or destroyed. If there is insufficient confidence in a management plan being implemented, then it might be better not to encourage access to the more sensitive areas. Long term, well-designed educational programmes are an essential requisite to promote good management of rural resources. The media should be extensively used and different ages and social-backgrounds need to be targeted in an appealing manner.

### 13.9.2 Scenarios

There are a multitude of scenarios that can be envisaged for rural areas in Gozo and Comino. Three main decision directions are contemplated and the respective envisaged resultant scenarios are highlighted below:

- a) **No additional intervention in rural areas.**  
IMPLICATIONS: - In this instance, the proposal is to leave the countryside in Gozo and Comino in its present state. The result would be that there would not be additional incentives to generate more visitation to Gozo. There is a widespread awareness that most travellers visit Gozo for the special characteristics offered by its landscape and to appreciate its rural qualities. It is also known that tourism is one of the pillars of the Gozitan economy. Therefore, if no positive intervention is undertaken, there is the

likelihood that either visitor numbers do not increase, or else they increase but are not the quality tourists that are desirable to attract. Mass and low spending tourism is often detrimental in the long term to the economy of small islands.

- b) **Allow further encroachment of urban development into the rural countryside.**  
**IMPLICATIONS:** - The situation would become worse than envisaged in scenario a) above if more urban development takes place in the countryside. The special characteristics of Gozo would be eroded away and Gozo would slowly cease to be a desirable place to inhabit or visit. The fate of Gozo would be envisaged to follow that of other areas in the Mediterranean which have been over-exploited. Some of these areas ceased to be popular destinations and have experienced considerable economic regression.
- c) **Undertake considerable effort to improve the quality of the rural landscape**  
**IMPLICATIONS:** - It makes perfect sense to nurture a resource which renders a place desirable to inhabit and visit. Research on the current and envisaged urban facilities is also suggesting that in most cases, future land-use needs could be accommodated within existing areas designated for development. This approach reinforces one of the main goals of the current Structure Plan for the Maltese Islands, ie. a policy to restrict urban development to existing developed areas. However, restricting development sprawl is not sufficient. A very significant proportion of the Gozitan landscape is maintained or is influenced by human activities. Therefore, if the landscape enhancing activities are encouraged and the appropriate measures are implemented to safeguard important habitats and features of cultural or natural importance, the quality of the Gozitan rural countryside should improve. If these measures are coupled with an effective planning, a sound management and monitoring system and if a long-term campaign of environmental awareness is established, then public awareness would facilitate positive rural interventions. Gozo can only benefit from a more attractive rural environment provided that this resource is nurtured, well interpreted, well marketed and carefully managed.

### 13.9.3 Objectives and Strategy

It is clear that the rural countryside in Gozo is a precious resource. Therefore, it is important to safeguard this resource not only to maximise the benefit that it imparts to the Gozitan community but also to render it an enjoyable experience to the visitor. Conservation of the rural environment should no longer be experienced as a constraint on development in Gozo but as a challenge and opportunity, which if properly addressed, would bring considerable benefit to the community.

In the policy formulation process, the following main objectives should be pursued to:

- Enhance the existing Gozitan landscape through intervention which is fully compatible with the natural and traditional cultural characteristics of the island.
- Identify damaged landscapes and intelligently intervene to create new rural spaces which promote and enjoyable rural experience.
- Discourage further urban encroachment into the countryside.

- Encourage the good design of settlement edge development so that the urban skyline as viewed from rural areas is appealing.
- Promote the enjoyment of long distance views, especially from the more accessible areas and carriageways and to discourage physical obstructions which block such views.
- Promote traditional cultural activities especially on abandoned agricultural land around the Gozitan hilltops and to discourage obtrusive farming development especially in visually sensitive areas.
- Advocate the use of traditional material, features and structures together with appropriate informal soft landscaping to mitigate existing and proposed development in rural areas.
- To locate non-traditional agricultural activities away from ridge edges, valleys, hillsides and other scenically sensitive areas.
- Encourage the proper maintenance of rubble walls as an important cultural heritage in the Gozitan rural landscape and to control erosion.
- Discourage the instalment of night lighting in remote areas in order to promote the appreciation of remoteness and the dark sky heritage in such areas.
- Safeguard sensitive ecological areas through the appropriate planning management measures.
- Identify areas for informal public rural recreation.
- Safeguard the as yet undeveloped plateaux, garrigue as well as rocky and sandy beaches.
- Delineate valleys and water catchment areas and to safeguard them from urban development.
- Delineate areas to be safeguarded for various levels of free and unhindered coastal access.
- Discourage human activities which promote the degradation of natural and cultural features in the countryside.
- Discourage land-use and human activities which release harmful amounts of chemicals or energy into the Gozitan countryside.
- Identify disturbed public areas for afforestation in native trees with a view to offer such areas for public informal recreation.
- Encourage the promotion of walking routes with adequate interpretation facilities in the countryside and as far as possible through the utilisation of existing countryside roads and lanes.
- Identify problem areas as candidate pilot sites to undertake an environmental management plan.
- Statutorily protect areas known to possess natural or cultural features worthy of conservation and to couple this protection with implementable, feasible and imaginative rural management plans.
- Continue the protection of archaeological sites and to take adequate measures to protect them from large numbers of visitors, the elements and incongruous structures and activities whilst protecting the setting in which they were originally created.
- Disseminate information on the archaeological heritage of Gozo and Comino and to encourage the sensitive but effective interpretation of these sites.

- Designate marine conservation areas in areas known to have special underwater features and to couple their geographic location with landward protected areas.

The objectives listed above are compatible with Structure Plan policies indicated in **Section 13.2** and make more emphasis on the need for positive intervention in rural areas. The main thrust of rural conservation policies for Gozo (and Comino) shall be to protect the rural environment through guided human intervention rather than to preclude any form of intervention. For example, it may be desirable to introduce pedestrian access to promote the enjoyment of currently inaccessible areas. There is for example very limited scope to introduce a few small parking pockets on disturbed areas. This intervention could help to promote the use of walking, cycling and horse-riding routes on identified circular routes. Of course, this and similar statements must not be interpreted as a free license to intervene without undertaking appropriate detailed background studies by people qualified in their respective fields and who shall be entrusted with the planning and management aspects of such areas. Public participation at all stages of formulation of such plans is deemed essential as is liaison with all the relevant public and private agencies with a presumed interest in the germane area. Notwithstanding the foregoing, in areas which are ecologically highly sensitive, measures to introduce access could be counterproductive and have to be considered with special attention. In general, further promotion of vehicular (as opposed to pedestrian) carriageways in rural areas is strongly discouraged.

Whilst the Structure Plan advocates the statutory designation of areas with a view towards their protection, care needs to be exercised on the manner in which this designation is conducted and the timing of its protection. Local and overseas experience indicates that statutory protection in rural areas without the relevant institutional structure to implement the envisaged protection measures can not only fail to deliver desired results but indeed can prove to be counterproductive. This statement is more relevant in instances where the relevant area is subject to high levels of visitation and where there is insufficient confidence in the enforcement systems being adopted. It is therefore desirable to couple planning and management of a particular area with short term and longer term educational programmes together with the provision of well-designed and easily understood interpretation facilities. Increased awareness within the local communities as well as in visitors helps to instil respect towards the features found in the countryside. Consequently, the likelihood for damage arising from inappropriate human activities is drastically reduced and effort is directed towards the amelioration of traditional rural features. Although long term educational campaigns inherently take long to deliver results (and this often discourages its promoters), the sooner one starts, the earlier the fruits are borne.

The conservation of local rural resources is not only of local or national concern but it constitutes part of the heritage of the International community. Apart from local commitments to honour international treaties and agreements, there is also a moral obligation to safeguard local heritage for current and future generations. Therefore it is essential to network with international agencies (with emphasis on EU networks) in order to secure international co-operation, guidance and assistance. The experience of other countries can help to avoid shortcomings committed elsewhere and to benefit from approaches which have yielded positive results. However, care must be exercised to adapt rather than adopt overseas methodologies as the various approaches can yield different results when operated in different contexts.

## 14. CONCLUSIONS

### 14.1 Introduction

The Inception report is based on information collated from the Planning Authority's internal resources, Commissioned surveys, Information available from other public and private agencies, meetings with a wide spectrum of agencies, site visits, literature, the internet and other sources identified as being of value to the compilation of this report.

This report contains the essence of the large amounts of data and other information collated during the first stages of the local plan formulation. It thus sets the course of action needed to proceed to the policy formulation stage. Apart from serving as a basis for policy formulation, this document is envisaged as a reference to aid in policy interpretation should this eventuality occur in future.

Clearly, the findings in this report show that insularity of Gozo poses a number of special situations which merit careful attention at the policy formulation stage and which renders Gozo different from other local plan areas.

### 14.2 Socio-economic Context

It can be stated that the general quality of life in Gozo is better than that of Malta. In spite of its small size, most of the services available in mainland Malta are also available in Gozo which are available on the Island of Malta, are also made available in Gozo. Home ownership rate is higher, education opportunities are increasing and there are no significant differences relating to the state of health when compared to mainland Malta. Pollution levels from excessive overloading of the transport network and industry are rather lower. The main problems relate to lower employment opportunities, access to mainland Malta, limited recreational possibilities (also related to the Gozo's physical size and small economies of scale), significant dependence on Malta for utilities, parking and circulation in the more crowded areas.

A good land-use plan is important to assist in the socio-economic development of Gozo. First of it, it must create an atmosphere which is conducive to the creation and maintenance of job opportunities. It must also ensure that the overall environmental quality of an area is maintained at as high as possible a level in order to attract investment, to promote economic activity and to render an area desirable to live in and to visit. These two seemingly conflicting requirements may be resolved if Gozo opts to create jobs that do not require land-intensive infrastructure but at the same time yield a good income. Examples include jobs in software development, cultural heritage interpretation, advertisement, some aspects of media and communications, international language education, marketing of idea, off-shore financial services and similar opportunities.

Often, different socio-economic activities have conflicting land-use demands. Apart from endeavouring to minimise conflicts, land-use planning should also ensure that foreseen socio-economic requirements are provided with the requisite infrastructure to be able to operate effectively. It must however be borne in mind that the Gozo and Comino Local Plan is an

enabling plan and thus implementation of the plan is very much dependent on a multitude of parameters. However, the plan should serve as a common reference platform to the multitude of agencies and individuals that interact socio-economically on the islands.

It is also crucial to stress on the importance on longer term as opposed to ad-hoc short term planning. Whilst in the short run, there may be evidence of a flourishing economy, the longer-term results may show otherwise. For instance, arguments are frequently presented to promote further capital projects so as to generate employment in the construction industry. The project is thus perceived as an end in itself i.e. to generate construction-related employment. This approach is flawed as it may give rise to a large number of buildings, structures or open spaces which end up either under-utilised or else are eventually abandoned. The environmental cost is the same irrespective of whether the building is in use. There are also infrastructural costs.

The above arguments are of particular relevance to Gozo. On the one hand job creation is a crucial issue which needs to be addressed. On the other hand, the environment in Gozo is also of economic significance. Building empty or under-utilised buildings will provide short-term employment in construction and related services but will in the long term undermine Gozo's and Comino's potential for attracting tourists, visitors and investment to the Island.

Therefore it is crucial that development is directed to maximise the potential of the existing facilities first and foremost and to upgrade the potential of the islands' natural and cultural heritage. These measures could offer new and exciting job opportunities in Gozo which are as yet non-existent.

Given that there are still tracts of public land available for development, it is very important that these are retained by public authorities so that at least the option base is left as wide as possible. Furthermore, incentives (eg, stewardship agreements) have to be developed to encourage the private sector to participate more actively in the provision of public facilities.

### 14.3 Comparison with Mainland Malta

A number of physical or evident differences, partially attributed to cultural dissimilarities between Malta and Gozo, have emerged during the information collation and analyses stage. Discussions and meetings undertaken by the Gozo and Comino Planning Team with public and parastatal agencies have been especially helpful to highlight these differences. Some of the differences between the islands, which emerge from the various studies, are listed below:

- Access to Gozo is heavily dependent on Malta with the main link being the *Mgarr* harbour. This is practically the only physical link with the rest of the world (including mainland Malta).
- Road network generally in a better shape than Malta
- Public transport is almost non-existent and this has given rise to increase in car-ownership rates.
- There is no airport (and thus no airport related noise and congestion). The *Xewkija* heliport is rather insignificant in terms of activity when compared to Luqa airport.

- There is no fully fletched harbour and thus there is a dependency on Malta’s harbour.
- With the notable exceptions of *Rabat/Fontana* area, the tourist resorts and the Harbour, it is still relatively easy to park in most areas of Gozo and traffic flow is much less.
- Houses generally larger and more lavishly decorated than Maltese counterparts. Building heights are also generally lower than those of Malta (with exceptions in *Marsalforn* and *Xlendi*)
- A large proportion of houses in Gozo command extensive countryside views from their back parts.
- Demand for multi-storey public housing is much less in Gozo.
- There are no slum areas.
- Rather than closed timber balconies, open and richly decorated stone balconies are more predominant in Gozo.
- Schools cater well for local requirements and many are indeed under-populated. In Malta, most of the public schools are overcrowded and less well maintained.
- The Gozo General Hospital lacks the more specialised facilities thus rendering some dependence on mainland Malta.
- Gozo is generally cleaner than Malta
- Uncommitted public land ownership is more limited than in Malta especially on coastal areas.
- A greater proportion of land in Gozo is privately owned. It is also much more difficult to trace ownership in Gozo than in Malta.
- Property prices are generally less expensive for urban property but farmhouses can be rather more expensive.
- Gozitans are generally more active in participating in community activities and show strong bonds with the locality or a particular association within a locality (eg. a particular local band club).
- Crime rates are rather lower in Gozo.
- Formal and informal recreational facilities are rather limited in Gozo and most are mainly geared to cater for tourism (including the Maltese tourist) requirements.
- There are no major designated public informal recreational areas (eg. *Buskett, Ta’ Qali* and *Hal-Far* in Malta).
- There is a general lack of accessible afforested areas in Gozo.
- Night-time activity is rather restricted although it has been on the increase in recent years.
- Shops are generally well stocked and the need to revert to mainland Malta for supply occurs only in the most specialist items. Indeed there are instances where items can be found in Gozo but not in Malta.
- Most of the retail and commercial activity is concentrated in *Rabat*. Retail and Commerce in Malta is much more spread out with settlements like *Sliema, B’kara, Paola* etc. being commercialcentres in their own right.
- Heavy Industry in Gozo is absent.
- There is no designated small garage industry area.
- There is no area designated for warehousing.
- A substantial proportion of Gozitans work in Malta whilst very few Maltese have to undertake daily crossings by sea to work in Gozo. Commuting times to the inner

harbour areas are in the region of 4 hours per day compared to 1 hour per day for people for people living in the outer harbour areas.

- The vast majority of tourist oriented establishments are family concerns.
- There are proportionally larger tracts of agricultural land and a significant proportion is well maintained and traditional in nature. Agricultural stores are much more limited than in mainland Malta.

It can therefore be seen from the foregoing that in spite of the close proximity to mainland Malta, there are significant variations which give Gozo its unique and distinct characteristics. Therefore, planning for Gozo must be considered within a slightly different context and with priorities and directions that may differ from the mainstream ones which may be more applicable to mainland Malta. This being said, it must be emphasized that Gozo must still operate within the same national planning policy framework as otherwise there will be departure from the current Structure Plan provisions which provide the strategic policy context for the Local Plan.

#### 14.4 Strategic Policy Context Compatibility

The findings of the local plan team have indicated that by and large, major policy deviations from the existing strategic spatial planning context are not envisaged. There are however certain policy areas where the local plan is expected to resolve problems of interpretation. In other instances, the local plan is envisaged to cover policy areas which are not (adequately) covered by the current Structure Plan. This is not considered as a deviation from the existing strategic context but rather an elaboration.

Gozo and Comino are both indicated as rural conservation areas and this special status is envisaged to be adopted by the local plan. However, provision for urban development within areas earmarked for development also needs to be taken into account. It is important to note that compatibility can only be related to the current Structure Plan and not to any findings which may eventually translate into new or modified policies for the revised Structure Plan for the Maltese Islands.

#### 14.5 Overall Strategy

The overall strategy for the Gozo and Comino Local Plan can be summarised as follows:

- **To ensure that enough land is available for the envisaged spatial development requirements till the year 2010 and beyond.**
- **To continue to enhance the unique cultural and natural characteristics that render Gozo and Comino so desirable to inhabit and visit.**
- **To encourage development which:**
  - Creates wealth and opportunities.
  - Improves the quality of Life.
  - Is Compatible with planning policy.
  - Is Efficient on land-use.
  - Does NOT constitute over-development.

- Does NOT overload circulation and parking capacities.
- Does NOT detract or endanger cultural or natural heritage.
- Is Compatible with surrounding activities.
- Does NOT release contaminants into its surroundings.

## APPENDIX A

### Climate

The following data represents a monthly breakdown of the main climatic parameters relevant to the island of Gozo. The data is important to illustrate part of the physical context in Gozo as well as to indicate the climatic context which is relevant to various aspects of policy making (eg. use of renewable resources)

**TABLE A.1**  
**Climate in Gozo**

Climatological Factors	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Year Total
Mean Temp (°C)	12.3	12.4	13.6	15.5	19.0	23.0	25.8	26.2	24.3	20.9	17.3	13.9	18.7
Mean Relative Humidity (%)	77.0	75.9	76.6	74.1	71.0	67.3	66.0	69.1	72.2	74.1	75.6	76.8	73.0
Duration of sunshine (hours)	164.4	176.5	225.6	255.3	303.6	337.2	375.6	348.1	270.7	225.3	183.8	158.2	252.1
Mean Wind Speed (m/s)	5.22	5.32	5.22	5.21	4.54	4.15	3.52	3.42	3.65	3.85	4.58	5.04	4.47
Astronomical Duration of Daylight (hours)	310	336	370	392	435	435	442	417	371	348	307	302	370
Global Extraterrestrial radiation (cal/sq/cm.)	433	555	720	870	968	1006	982	899	766	606	464	396	722
Potential Evapotranspiration (mm) Penmann	48.2	60.2	92.4	121.6	158.5	186.1	205	185.1	134.7	93.7	59.6	46.0	139.1
Potential Evapotranspiration (mm) Turc	48.9	58.5	85.1	111.7	140.6	168.5	183.4	167.9	129.0	92.1	64.3	47.9	129.8
Rainfall (mm)	87.5	57.0	42.3	24.2	8.2	2.9	0.7	6.9	39.0	109.6	86.8	102.7	567.8
Days with rain (days)	14.2	10.6	8.8	6.0	3.0	1.1	0.4	1.1	4.0	10.5	11.2	14.2	85

Source: Hydrology study commissioned by PA through Harrison & co. pp.6 & 10

# APPENDIX B

## Land Availability

The Planning Authority carried out an exercise to establish land availability for Malta and Gozo. The information was collated from aerial photographs taken in 1988 and 1994. It was also checked by the Local Planning Unit in 1999. The information for each locality and sub-region in Gozo is given in **TABLE B.1**.

**TABLE B.1**

### LAND AVAILABILITY IN GOZO

Local Council	Area within TPS (exc. ind. estates etc)	Vacant excluding under construction @ mid-1998	Vacant including under construction @ mid -1998 (within scheme)	Land (building areas only) schemed in 1988	Land (building areas only) constructed 1988-1998 within scheme
Fontana	164,393	9936	10175	47701	7028
Ghajnsielem	653,960	111058	131311	192348	55815
Gharb	401,123	52091	56971	103022	26489
Ghasri	153,027	21386	23911	45039	10552
Kercem	348,301	35388	37744	132627	11730
Munxar	293,659	27263	36004	67771	19727
Nadur	956,336	143318	159065	269364	43495
Qala	518,706	98196	110951	118374	25515
Rabat (Victoria)	1,187,290	84142	108241	494208	47339
San Lawrenz	168,570	20433	23293	49397	4104
Sannat	405,629	27459	29499	124355	12144
Xaghra	1,090,100	111277	132210	273332	37879
Xewkija	906,320	129770	131784	292525	83423
Zebbug (Ghawdex)	558,484	40492	55347	154890	34566
<b>TOTALS</b>	<b>7,805,900</b>	<b>912,209</b>	<b>1,046,508</b>	<b>2,364,952</b>	<b>419,805</b>

Source: Strategic Planning Unit 1998 revised by Local Planning Team 1999. Note: the term vacant in the table implies undeveloped land within development schemes.

The **TABLE B.1** clearly shows that in all the localities, there is a substantial proportion of vacant land within areas currently designated for development. More importantly, it is evident that only 17% of the areas earmarked for additional development in the 1988 Temporary Provisions schemes has been developed till 1998. This implies various points namely:

- If the rate of development adopted in the period 1988-1998 is maintained, then the existing provision within areas earmarked for development should for almost 49 years after 1998.

- b) The topic paper on population and housing in Table 13 indicates that in 1995<sup>126</sup>, a total of 15,448 dwelling units existed in Gozo of which 6,082 units were vacant. Given that the envisaged population of Gozo is envisaged not to exceed the 31,000 mark, the figure indicates an occupancy rate of around 2 persons per dwelling. This implies that the registered and occupied dwelling stock was already sufficient to cater for the envisaged demand till 2010.
- c) The Structure Plan Memorandum (on Table 6.1 p.28) indicates a projection of 1,500 new dwellings till 2010 (High Estimate). Assuming that 90% of the land developed between 1988 and 1998 was devoted for residential development and that each unit occupied 150 m<sup>2</sup>, then it is estimated that more than 2,500 terraced house size units were constructed in half the time horizon envisaged by the 1990 structure plan. Given that substantial tracts of land (especially at Marsalforn) were developed on 4 storeys and given the substantial percentages on unoccupied or partially occupied dwellings as indicated through water and electricity meter data, it is clear that there is a gross oversupply problem in Gozo.

Notwithstanding these considerations and those highlighted in **Chapter 5**, the local planning unit has received more than 800 applications to consider amendments to the development schemes. The large majority of these requests related to extensions of the current development schemes. If these requests were to be endorsed, the current areas earmarked for development would increase in size by 41% and the increase in size would cover an area which is larger than that covered by the Island of Comino. The area also represent a ration of 350% to the as yet undeveloped land within areas currently earmarked for development. **TABLE B.2.** illustrates.

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126

**TABLE B.2****REQUESTS FOR SCHEME AMENDMENTS IN GOZO**

Local Council	LOCAL COUNCILS AREAN in sq.m	SCHEME REQUESTS AREA in sq.m	% of REQUESTED AREA to LOCAL COUNCIL AREA	% of REQUESTED AREA to CURRENTLY SCHEMED AREA	% of REQUESTED AREA to CURRENTLY DESIGNATED UCA's	Vacant excluding under construction @ mid-1998	% of REQUESTED AREA to VACANT LAND (excluding under construction in mid-1998)
Fontana	473,700	132,736	28.0%	80.7%	187.3%	9936	1336.0%
Ghajnsielem	2,823,000	384,475	13.6%	58.8%	179.4%	111058	346.2%
Gharb	2,899,000	148,052	5.1%	36.9%	75.6%	52091	284.2%
Ghasri	7,176,000	206,544	2.9%	135.0%	209.8%	21386	965.8%
Kercem	5,494,000	121,620	2.2%	34.9%	114.0%	35388	343.7%
Munxar	7,174,000	210,088	2.9%	71.5%	319.8%	27263	770.6%
Nadur	4,633,000	260,096	5.6%	27.2%	50.8%	143318	181.5%
Qala	5,005,000	205,665	4.1%	39.6%	158.6%	98196	209.4%
Rabat (Victoria)	3,849,000	221,421	5.8%	18.6%	58.8%	84142	263.2%
San Lawrenz	7,624,000	268,795	3.5%	159.5%	339.1%	20433	1315.5%
Sannat	7,558,000	268,952	3.6%	66.3%	235.2%	27459	979.5%
Xaghra	4,527,000	71,880	1.6%	6.6%	27.7%	111277	64.6%
Xewkija	3,573,000	254,086	7.1%	28.0%	77.9%	129770	195.8%
Zebbug (Ghawdex)	5,858,000	445,769	7.6%	79.8%	237.6%	40492	1100.9%
<b>TOTALS</b>	<b>68,666,700</b>	<b>3,200,181</b>	<b>4.7%</b>	<b>41.0%</b>	<b>116.9%</b>	<b>912,209</b>	<b>350.8%</b>

Source: Local Planning Unit (2000)

## APPENDIX C

# Utilisation of Dwellings

The percentage of dwellings which were in use throughout the year (i.e. no water or electricity consumption) in Gozo is 65 per cent. The corresponding figure for Malta is 77 per cent. Conversely the percentage of dwellings which were not made use of at any time during the year was 13 per cent - more than 1 in every 8 dwellings (i.e. 2,100 units). The corresponding percentage for Malta was 5 per cent. The figures derived from the water and electricity metres are given in **(TABLES C.1 & C.2)**

These figures are indicative of the gross under-utilisation of the existing housing stock in Gozo. A sizeable part of the housing stock is not made use of in any way yet it takes up precious land and infrastructure resources. It is likely that many of these vacant dwellings are retained for investment purposes.

*Zebbug* (including *Marsalforn*)<sup>127</sup> has over 530 dwelling units (21 per cent of dwellings for that locality) for which no water consumption was recorded in 1995. Similarly, *Munxar* (including *Xlendi*) has 190 units (22 per cent of dwellings for that locality) which are vacant throughout the year. **(TABLE C.1)**

Rabat has 311 houses i.e. 1 every 9 houses for which no water consumption was recorded during 1995. When one considers that this is the main residential centre in Gozo, this is a high proportion. It provides an opportunity to relieve demand for housing by bringing these units into use. Villages in the Rural West namely *San Lawrenz*, *Gharb* and *Ghasri* have a high proportion of their dwellings not in use (14 to 18 per cent).

The overall figures for utilisation of dwellings are generally confirmed by the 1995 Census data. **(TABLE C.1)**. The proportion of occupied dwellings (i.e. dwellings used for permanent residency) is 60 %. The corresponding percentage for Malta is 79%. Nineteen per cent of the dwelling units in Gozo (i.e. almost 3,000 units) were recorded as being non-summer residence. The corresponding percentage for Malta is 14 per cent. There may be some which are in use, say, for the occasional visit to Gozo by a Maltese, but most of them would be vacant and unused.

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<sup>127</sup> It is not possible to distinguish between the village of Zebbug and the seaside resort of Marsalforn. Data for all the local council boundary is given. The same applies to the village of Munxar and the seaside resort of Xlendi.

**TABLE C.1**  
**UTILISATION OF DWELLINGS BY LOCAL COUNCIL AREA , GOZO**  
**1995**

Council Name	3 Period consumption No.	1 or 2 Period consumption No.	0 consumption No.	Total No.	3 Period consumption %	1 or 2 Period consumption %	0 consumption %
Fontana	223	56	37	316	71	18	12
Ghajnsielem	751	268	143	1,162	65	23	12
Gharb	392	92	103	587	67	16	18
Ghasri	187	37	40	264	71	14	15
Kercem	545	108	48	701	78	15	7
Munxar	451	223	193	867	52	26	22
Nadur	1,322	443	170	1,935	68	23	9
Qala	571	185	83	839	68	22	10
Rabat	2,008	527	311	2,846	71	19	11
San Lawrenz	198	42	40	280	71	15	14
Sannat	536	121	59	716	75	17	8
Xaghra	1,291	374	235	1,900	68	20	12
Xewkija	1,069	250	104	1,423	75	18	7
Zebbug	1,060	967	533	2,560	41	38	21
<b>Gozo and Comino</b>	<b>10604</b>	<b>3693</b>	<b>2099</b>	<b>16396</b>	<b>65</b>	<b>23</b>	<b>13</b>

Source : WSC water and Electricity Data 1995

**TABLE C.2**  
**UTILISATION OF DWELLINGS BY LOCAL COUNCIL AREA , GOZO**  
**1998**

PA_COUNCIL	POPULATION	3 Period Consumption	Zero Consumption	1 or 2 Period Consumption	TOTAL DWELLINGS
Fontana	823	261	70	95	426
G hajnsielem	2688	715	124	432	1271
Gharb	1082	351	64	251	666
Ghasri	432	169	18	101	288
Kercem	1643	488	51	213	752
Munxar	934	326	158	499	983
Nadur	4392	1336	170	588	2094
Qala	1659	510	104	324	938
Rabat (Victoria)	6778	1827	256	910	2993
San lawrenz	585	172	16	111	299
Sannat	1783	533	52	202	787
Xaghra	3996	1214	232	647	2093
Xewkija	3330	982	108	366	1456
Zebbug	1711	691	505	1559	2755
<b>TOTAL</b>	<b>31836</b>	<b>9575</b>	<b>1928</b>	<b>6298</b>	<b>17,801</b>

Source : WSC water and Electricity Data 1998

### Summer Residences

According to the 1995 Malta Census of Population and Housing, some 3,100 dwellings in Gozo are used as a summer residence. There are another 3,000 units which are indicated as non-summer residences. This does not preclude, however, that some of the latter are rented out to Maltese for short periods of time. No distinction is made in the Census data between partially used and vacant dwellings in the Census. The Water and Electricity Meter data (W.&E.M.) is therefore a useful source of information for this purpose.

From the Water and Electricity meters it was established that 3,700 dwellings were partially made use of during the year, probably most of them for summer residence and short holidays.

A substantial number of Maltese stay overnight in Gozo. The length of stays vary from either 2 to 3 days if the stay is during a week-end or a long holiday to 7 days if the option to stay for a week is adopted. Whilst many rent apartments or farmhouses, several Maltese have purchased a flat in Gozo and use of it for short holidays. Without a doubt, domestic tourism generates significant economic activity in Gozo and should therefore be encouraged. The substantial over provision of dwellings in Gozo may be partially justified in these terms. On the other hand as indicated, there are 2,100 dwelling units which were not made use of at any time of year and which, therefore, did not contribute in any way to economic activity in Gozo.

Seasonality issues are also relevant to dwellings used for domestic tourism. The use of one apartment for longer periods in the year is likely to have a similar economic impact as the use of a number of apartments during August only. The environmental impact will be, however, far less with less use of land and infrastructure resources, less visual impact and also less crowding. As for tourism, the thrust of the settlement policies should be to make more intensive use of current accommodation resources rather than the creation of new accommodation.

Some 1,525 beds are registered as self-catering units for foreign tourists.<sup>128</sup> Assuming up to six beds per unit this is equivalent to 250 to 300 units. It is likely that there are several more which are unregistered. Flats rented to Maltese do not need to be registered. It is likely that most units for which there was some consumption during the year were rented to Maltese.

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<sup>128</sup> *Prospects for Development; the Gozitan Perspective, Hon. Dr. Anton Refalo LL.D., then MP Parliamentary Secretary for Gozo Presentation in Bank of Valletta Gozo Conference, Tourism a Pillar of Sustainable Development in Gozo, 1997*

**TABLE C.3****UTILISATION OF DWELLINGS (1995 CENSUS), GOZO AND MALTA**

ISLAND		OCCUPIED DWELLINGS	PARTIALLY USED AND VACANT DWELLINGS		TOTAL
			Summer residence	Non-summer residence	
Gozo	No.	9,188	3,098	2,975	15,281
	%	60	21	19	100
Malta	No.	110,291	9,869	19,781	139,941
	%	79	7	14	100

Source: Malta Census of Housing and Population 1995

**TABLE C.4****VACANT, NON-SUMMER DWELLING BY PHYSICAL STATE, GOZO AND MALTA**

ISLAND		NEW AND/OR GOOD CONDITION	IN NEED OF SUBS. REPAIR AND/OR DERELICT	TOTAL VACANT	TOTAL DWELLING STOCK
Gozo	No	1,721	1,254	2,975	15,281
	%	11	8	19	100
Malta	No	12,243	7,538	19,781	139,941
	%	9	5	14	100

Source: Malta Census of Housing and Population 1995

# APPENDIX D

## Property Values

Since the late 1980's, the price of property in the Maltese Islands rose sharply and Gozo is no exception. **TABLE D.1** compares price rises in Gozo with those of the Maltese Islands.

**TABLE D.1**

### PROPERTY VALUES, GOZO AND MALTESE ISLANDS , 1970-1995

YEAR	APARTMENTS - (3 BEDROOMS)		TERRACED HOUSE - (3 BEDROOMS)	
	GOZO	MALTESE ISLANDS	GOZO	MALTESE ISLANDS
1970	5,000	6,300	5,100	5,800
1975	7,000	7,600	5,500	6,300
1980	7,100	10,100	8,000	12,100
1985	7,200	9,100	10,000	14,000
1990	17,500	18,200	18,600	22,200
1995	24,270	26,000	46,100	43,200

Source: Strategic Planning Unit, Planning Authority 1998

Prices of three bedroom terraced houses should be treated with caution. It is likely that the predominant house type in the seventies was the traditional terraced house found in older urban areas. In the eighties and nineties the terraced house is more likely to be the typical modern dwelling developed in new urban areas.

Property in Gozo has been over the years cheaper than that in Malta. The 1995 figures suggest that this is changing. Depending on demand for holiday homes in the coming years, there may be a situation where prices in Gozo will be higher.

The price rises in Gozo have generally followed the pattern of rises in the Maltese Islands, except for 1975 - 80 when rises in Gozo were much slower. However price rises were steepest in the 1990 - 1995 period in Gozo. Between 1990 and 1995 the price of a terraced house in Gozo rose sharply to the extent that a higher price than Malta was recorded. This may be due to increased demand for maisonettes rather than terraced houses in Malta thus easing inflationary pressures. On the other hand, in

Gozo maisonettes are as yet not popular and hence the high demand for terraced houses pushed prices upwards.

There has been much speculation about the impact of Maltese and foreign purchases on the Gozitan property, but little data to substantiate this impact. Foreigners and Maltese seek properties which are unlikely to be sought by Gozitans for permanent residence namely converted farmhouses and holiday apartments. On the other hand there may be houses in old urban cores which could within reason be refurbished for use by Gozitans. Owners would however prefer to set a price aimed at foreign or Maltese buyers and wait to sell rather than sell at a lower price to Gozitans.

# APPENDIX E

## Tourism Survey

The tables indicated in Appendix E are based on an analysis of a Tourism and Recreation Survey Conducted By the Planning Authority.

### TABLE E.1

#### Table E.1.A - Description

	<i>Time of year</i>	<i>Length of stay</i>	<i>Group size</i>
Overseas tourist on day trip	mainly summer but also shoulder months	up to six hours	normally come on organised tour but also some on own initiative
Maltese on day trip	-do-	up to seven or eight hours	small groups (family or group of friends), also larger groups <sup>129</sup>
Maltese overnight visitors	-do-	two days up to one week	small groups (family or group of friends)
Overseas overnight tourists - tour operator package tour	-do-	13 days summer, 9.5 days shoulder months, 46 days winter	large groups
Overseas overnight tourists - own arrangements	-do-	(refer to above figures)	in small groups, families or couples
Foreigners or Maltese acquiring property	-do-	a week or two	in small groups, families or couples
Emigrants visiting relatives	-do-	from several weeks to several months	couples or families
Retirement tourism and returned migrants	throughout year	most of the year	couples or families

#### Table E.1.B - Services

	<i>Accommodation</i>	<i>Transport on Gozo</i>	<i>Time spent/ services required</i>
Overseas tourist on day trip	not applicable	coaches.	visit one or two sites of interest, restaurant, shop
Maltese on day trip	not applicable	own car	move around and explore - larger groups concentrate in popular resorts and beaches
Maltese overnight	54 per cent rented apartments/villas/farmhouse, the	own car, only 5 per cent use public transport	beaches or seaside resort, restaurant, also places of

<sup>129</sup> All data quoted in these tables are from Tourism and Recreation Survey, carried out by the Planning Authority. 19 per cent of Maltese who visit Gozo went on a day trip, the remaining 81 per cent stayed overnight

visitors	rest hotels, relatives.		interest, also cultural event
Overseas overnight tourists - tour operator package tour	hotels	coach or rented cars	beaches, sites of interest, restaurants
Overseas overnight tourists - own arrangements	hotels or rented farmhouses/ apartments	rented car	beaches, restaurants, some "discovery" re sites of interest
Foreigners or Maltese acquiring property	in acquired property	rented car, for Maltese -own car	beaches, sites of interest, restaurants
Emigrants visiting relatives	in own dwelling, or with relatives	rented car or with relatives	visiting friend and relatives
Retirement tourism and returned migrants	in rented or acquired property	acquire car <sup>130</sup>	services - retail, house maintenance etc.

<sup>130</sup> Note: With age ,mobility becomes a problem

**Table E.1.C - Impact**

	<i>Expenditure on Gozo</i>	<i>Environmental impact</i>	<i>Social impact</i>
<b>Overseas tourist on day trip</b>	very low per capita - overall moderate because of numbers involved	high impact, overcrowding at peak times and key locations	impact long-term reflected in attitude towards tourists, behaviour of the young generation
<b>Maltese on day trip</b>	variable depending whether eating out; limited because of limited time	larger groups may cause crowding in popular areas	behaviour of some groups may cause inconvenience
<b>Maltese overnight visitors</b>	good - on accommodation but also on entertainment	at peak times, traffic impact at Rabat and seaside resorts, also overcrowding; insensitive developments to meet demand for holiday flat	behaviour of some groups especially young cause irritation to sections of Gozitan society; also social impact from discos
<b>Overseas overnight tourists - tour operator packages</b>	variable on accommodation depending on agreement with operator - fair on other services	limited impact	??
<b>Overseas overnight tourists - own arrangements</b>	good on accommodation as well as services	low impact	little / no impact
<b>Foreigners or Maltese acquiring property</b>	substantial initial benefit on property acquisition, expenditure on house related services, also other expenditure when visiting	properties kept vacant for most of the year, reduces vitality of urban areas	??
<b>Emigrants visiting relatives</b>	limited expenditure but over long period of time stay	little or no impact	??
<b>Retirement tourism and returned migrants</b>	benefits from prop. acquisition or rented accommodation., expenditure on house related services, limited exp. on services but over longer periods.	little or no impact	??

# APPENDIX F

## Scheduling in Gozo

The following is a listing of Scheduled properties and areas in Gozo by type, year of scheduling and level of protection:

### FONTANA

<b>Scheduled in 2000</b>					
Property Address	GN No	Category	Type	Feature	Level
L/O KERCEM, MUNXAR, FONTANA, RABAT GOZO	856/00	AHLV	AHLV	WIED IX -XLENDI WATERSHED	N/A
WIED IL-LUNZJATA	856/00	ECOLOGY	BUFFER ZONE		3
WIED IL-LUNZJATA	856/00	ECOLOGY	AEI	VALLEY	2
TAS-SAQWI	856/00	ECOLOGY	AEI	MAQUIS	2
TAS-SAQWI	856/00	ECOLOGY	BUFFER ZONE		3
TAS-SAQWI	856/00	ECOLOGY	BUFFER ZONE		4
TRIQ WIED SIEKEL	856/00	ECOLOGY	AEI, SSI	CAVES	2
PJAZZA L-GHEJUN	856/00	HYDROLOGY	SSI	SPRING	1
PJAZZA L-GHEJUN	856/00	ARCHITECTURE	MONUMENT	FOUNTAIN	1
PJAZZA L-GHEJUN	856/00	ECOLOGY	AEI, SSI	SPRING	1
PJAZZA L-GHEJUN	856/00	ECOLOGY	AEI	SPRING	1

### GHAJNSIELEM

<b>Scheduled in 1995</b>					
Property Address	GN No	Category	Type	Feature	Level
IT-TORRI TA' SANTA MARIJA, TRIQ IL-BATTERIJA, KEMMUNA	729/95	ARCHITECTURE	MILITARY	TOWER	1
IT-TORRI TA' MGARR IX-XINI, TA' MGARR IX-XINI	729/95	ARCHITECTURE	MILITARY	TOWER	1
IL-BATTERIJA TA' SANTA MARIJA, IL-MISTIKA, KEMMUNA	729/95	ARCHITECTURE	MILITARY	BATTERY	1
FRESHWATER WETLAND AND BUFFER ZONE AT GHAJN KLIN, IX-XATT L-AHMAR		ECOLOGY	AEI	FRESHWATER WETLAND	1

<b>Scheduled in 1996</b>					
Property Address	GN No	Category	Type	Feature	Level
TRIQ TA' LAMBERT	360/96	ARCHITECTURE	MILITARY	TOWER	1
TRIQ TA' LAMBERT	360/96	ARCHITECTURE	RELIGIOUS	CHAPEL	1
IT-TAGEN, COMINO		ECOLOGY	AEI	BUFFER ZONE	3
IL-BAJJA TA' SANTA MARIJA, COMINO		ECOLOGY	AEI		1
IL-BAJJA TA' SANTA MARIJA, COMINO		ECOLOGY	SSI		1

**Scheduled in 1997**

Property Address	GN No	Category	Type	Feature	Level
MANOEL'S RESTAURANT, TRIQ MANOEL DE VILHENA	008/97	ARCHITECTURE	INDUSTRIAL	WAREHOUSE	1
BORG IL-GHARB AND L-MREJSBIET	241/97	ARCHAEOLOGY	SAI	TEMPLE	A
BORG IL-GHARB AND L-MREJSBIET	241/97	ARCHAEOLOGY	SAI	TEMPLE	A
BORG IL-GHARB AND L-MREJSBIET	241/97	ARCHAEOLOGY		BUFFER ZONE	A

**GHARB****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
NO. 42, TRIQ L-ISQOF MIKIEL MORINA	722/95	ARCHITECTURE	CIVIL	DWELLING	2

**Scheduled in 1997**

Property Address	GN No	Category	Type	Feature	Level
ALLEY OFF ST. PETER STREET	008/97	ARCHITECTURE	CIVIL	DOMESTIC	2

**GHASRI****Scheduled in 1997**

Property Address	GN No	Category	Type	Feature	Level
UNNUMBERED PROPERTY, TRIQ IL-FANAL, GHAMMAR	008/97	ARCHITECTURE	CIVIL	DOMESTIC	2

**KERCHEM****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
FRESHWATER WETLAND AND BUFFER ZONE AT L-GHADIRA TA' SARRAFLU		ECOLOGY	SSI	FRESHWATER WETLAND	1

**Scheduled in 1997**

Property Address	GN No	Category	Type	Feature	Level
TRIQ SANTA LUCIJA	241/97	ARCHITECTURE	INDUSTRIAL	MILL	1
TRIQ SANTA LUCIJA	241/97	ARCHITECTURE	INDUSTRIAL	BUFFER ZONE	1

**Scheduled in 1998**

Property Address	GN No	Category	Type	Feature	Level
RAS IL-WARDIJA	829/98	ARCHAEOLOGY	SAI	ROCK CUT BASIN, STRUCTURAL REMAINS, ANCIENT REMAINS SANCTUARY AND BUFFER ZONE	A

**Scheduled in 2000**

Property Address	GN No	Category	Type	Feature	Level
L/O KERCEM, MUNXAR, FONTANA, RABAT GOZO	856/00	AHLV	AHLV	WIED IX -XLENDI WATERSHED	N/A
L/O KERCEM, MUNXAR	856/00	ECOLOGY	BUFFER ZONE		3
WIED IL-LUNZJATA	856/00	ECOLOGY	BUFFER ZONE		3
WIED IL-LUNZJATA	856/00	ECOLOGY	AEI	VALLEY	2
WIED IL-LUNZJATA	856/00	ECOLOGY	AEI	VALLEY	2
TAX-XLENDI	856/00	GEOMORPHOLOGY	SSI	FAULT	2
TA' GHAJN TUTA	856/00	ARCHITECTURE	MONUMENT	FOUNTAIN	1
WIED IL-LUNZJATA	856/00	ECOLOGY	AEI	SPRING	1
TRIQ PETRI	856/00	ARCHITECTURE	CIVIL	VERNACULAR	2
TRIQ PETRI	856/00	ENGINEERING	CIVIL	STEPS	2
GHAR GHERDUF, TRIQ WIED IL-LUNZJATA	856/00	ARCHAEOLOGY	SAI	PALAEOCRISTIAN HYPOGEA	B
TRIQ XUXA	856/00	ARCHAEOLOGY	BUFFER ZONE		B
TRIQ XUXA	856/00	ARCHAEOLOGY	SAI	PALAEOCRISTIAN HYPOGEA	E
TRIQ XUXA	856/00	ARCHAEOLOGY	SAI	BUILDING REMAINS	E
TRIQ XUXA	856/00	ARCHAEOLOGY	SAI	QUARRY	B
WIED IL-LUNZJATA	856/00	ARCHITECTURE	MONUMENT	FOUNTAIN	1
TA' GHAJN TUTA	856/00	ECOLOGY	AEI	SPRING	1
WIED IL-LUNZJATA	856/00	ECOLOGY	AEI, SSI	SPRING	1
TA' GHAJN TUTA	856/00	HYDROLOGY	SSI	SPRING	1

**MUNXAR****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
IT-TORRI TAX-XLENDI, IL-MISRAH	729/95	ARCHITECTURE	MILITARY	TOWER	1
IL-FEKRUNA PROMONTARY AND BUFFER ZONE		ECOLOGY	SSI	PROMONTARY	1

**Scheduled in 2000**

Property Address	GN No	Category	Type	Feature	Level
L/O KERCEM, MUNXAR, FONTANA, RABAT GOZO	856/00	AHLV	AHLV	WIED IX -XLENDI WATERSHED	N/A
L/O KERCEM, MUNXAR	856/00	ECOLOGY	BUFFER ZONE		3
IX-XLENDI	856/00	ECOLOGY	AEI, SSI	VALLEY SIDE	2
IX-XLENDI	856/00	ECOLOGY	AEI, SSI	CLIFF	1
WIED IX-XLENDI	856/00	ECOLOGY	AEI, SSI	VALLEY	1
XLENDI	856/00	ECOLOGY	BUFFER ZONE		3
TRIQ IL-QSAJJAM	856/00	ECOLOGY	BUFFER ZONE		4
IL-WIED TAL-KANTRA	856/00	ECOLOGY	AEI	CLIFFS, VALLEY	2
TA' GHAJN TUTA	856/00	ECOLOGY	AEI	VALLEY SIDE	2
WIED IL-LUNZJATA	856/00	ECOLOGY	AEI	VALLEY	2
IL-WIED TAS-SAQWI	856/00	ECOLOGY	AEI, SSI	FAULT, WATERCOURSE	2
TA' WISTIN FARUN	856/00	ECOLOGY	AEI	VALLEY SIDE	2
IL-WIED TAS-SAQWI	856/00	ECOLOGY	BUFFER ZONE		3

**Scheduled in 2000**

Property Address	GN No	Category	Type	Feature	Level
IL-WIED TA L-GHAWDXIJA	856/00	ECOLOGY	AEI	GARIGUE	2
WIED IX-XLENDI, XLENDI	856/00	ECOLOGY	AEI	VALLEY SIDE	2
WIED IX-XLENDI, XLENDI	856/00	ECOLOGY	AEI	VALLEY SIDE	2
TRIQ XLENDI, XLENDI	856/00	ECOLOGY	BUFFER ZONE		3
TRIQ IL-KAPPAR, XLENDI	856/00	ARCHITECTURE	INDUSTRIAL	UNDERGROUND FLOUR MILL	1
TRIQ IX-XLENDI	856/00	ARCHITECTURE	RELIGIOUS	CHAPEL	1
IX-XLENDI	856/00	GEOMORPHOLOGY	SSI	DOLINE	2
IL WIED TAL-KANTRA, XLENDI	856/00	ENGINEERING	CIVIL	BRIDGE	2
TAX-XLENDI	856/00	ARCHITECTURE	RURAL	ANIMAL PEN	2
UNDERNEATH TRIQ IX-XLENDI	856/00	ECOLOGY	AEI	CAVE	2
IL-WIED TAS-SAQWI	856/00	GEOMORPHOLOGY	SSI	FAULT	2
SITE OVERLOOKING IL-WIED TA' L-GHAWDXIJA	856/00	ARCHITECTURE	RURAL	TRESHING FLOOR	2
IL-WIED TAL-KANTRA, XLENDI	856/00	GEOMORPHOLOGY	SSI	COASTAL CLIFFS	2

**NADUR****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
IT-TORRI TA' ISOPU, TA' GHAJN LEMBUBA	729/95	ARCHITECTURE	MILITARY	TOWER	1
IR-RAMLA IL-HAMRA (NADUR AND XAGHRA)		ECOLOGY	AEI	SAND DUNE	2
REMAINS OF BELANCOURT BATTERY (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	BATTERY	1
REMAINS OF RETRENCHMENT (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	RETRENCHMENT	1
REMAINS OF STATUE (NADUR & XAGHRA)	007/95	ARCHITECTURE	MONUMENT	STATUE	1
SALIENT OF RAMLA REDOUBT (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	REDOUBT	1
FOUGASSE (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	FOUGASSE	1
PART OF BLOCKHOUSE AND NADUR BATTERY (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	BLOCKHOUSE/BATTERY	1
UNDER WATER OBSTACLE (SEA WALL) (NADUR & XAGHRA)	007/95	ARCHITECTURE	MARINE	SEA WALL	1
REMAINS OF PATHWAY (NADUR & XAGHRA)	007/95	ENGINEERING	CIVIL	PATHWAY	1

**QALA****Scheduled in 1994**

Property Address	GN No	Category	Type	Feature	Level
QUARRIES, TA' VARDATI	731/94	ARCHITECTURE	MILITARY	FORT	1
ST. ANTHONY FORT, TA' VARDATI	731/94	ARCHITECTURE	MILITARY	FORT	1

**Scheduled in 1997**

Property Address	GN No	Category	Type	Feature	Level
TRIQ GRUNJU	241/97	ARCHITECTURE	INDUSTRIAL	WINDMILL	1
TRIQ GRUNJU	241/97	ARCHITECTURE	INDUSTRIAL	BUFFER ZONE	1

**Scheduled in 1998**

Property Address	GN No	Category	Type	Feature	Level
MENHIR, TRIQ IT-TEMPJU, QALA (GHAWDEX)	290/98	ARCHAEOLOGY	SAI	MENHIR	B
TRIQ IT-TELGHA	313/98	ARCHITECTURE	RURAL	FARMHOUSE	2

**RABAT****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
CATHEDRAL BELL TOWER, TRIQ IL-FOSOS	427/95	ARCHITECTURE	MILITARY	TOWER	1
TOWER AT PJAZZA KATTIDRAL	427/95	ARCHITECTURE	MILITARY	TOWER	1
LAW COURTS, PJAZZA KATTIDRAL	427/95	ARCHITECTURE	CIVIL	LAW COURTS	1
CATHEDRAL, PJAZZA KATTIDRAL	427/95	ARCHITECTURE	RELIGIOUS	CATHEDRAL	1
BISHOPS PALACE, PJAZZA KATTIDRAL	427/95	ARCHITECTURE	CIVIL	PALACE	1
ARCHES, TRIQ IZ-ZENQA	427/95	ARCHITECTURE	CIVIL	ARCHES	1
2 UNNUMBERED HOUSES, TRIQ IZ-ZENQA	427/95	ARCHITECTURE	CIVIL	DWELLING	1
RUINS, TRIQ IL-KWARTIER TA' SAN MARTIN	427/95	ARCHITECTURE	CIVIL	RUINS	1
NATURAL SCIENCE MUSEUM, TRIQ IL-KWARTIER TA' SAN MARTIN	427/95	ARCHITECTURE	EDUCATIONAL	MUSEUM	1
3 HOUSES, TRIQ IL-KWARTIER TA' SAN MARTIN	427/95	ARCHITECTURE	CIVIL	DWELLING	1
ST. ANNA'S HOUSE, TRIQ IL-KWARTIER TA' SAN MARTIN	427/95	ARCHITECTURE	CIVIL	DWELLING	1
OLD PRISONS, TRIQ IL-KWARTIER TA' SAN MARTIN	427/95	ARCHITECTURE	MILITARY	PRISONS	1
HOUSE, IL-BASTJUN TA' SAN MIKIEL	427/95	ARCHITECTURE	CIVIL	DWELLING	1
ARCHAEOLOGY MUSEUM, TRIQ BIEB L-IMDINA	427/95	ARCHITECTURE	EDUCATIONAL	MUSEUM	1
2 HOUSES, TRIQ BIEB L-IMDINA	427/95	ARCHITECTURE	CIVIL	DWELLINGS	1
MAGAZINES (CRAFT SHOP), TRIQ BIEB L-IMDINA	427/95	ARCHITECTURE	CIVIL	CRAFTS SHOP	1
LOGGIA WITH WORKS DEPARTMENT OFFICES, TRIQ BIEB L-IMDINA	427/95	ARCHITECTURE	MILITARY	LOGGIA	1
ST. JOHN'S CAVALIER, TRIQ IL-FOSOS	427/95	ARCHITECTURE	MILITARY	FORTIFICATION	1
CRAFTS CENTRE, TRIQ IL-FOSOS	427/95	ARCHITECTURE	CIVIL	CRAFTS CENTRE	1
CATHEDRAL MUSEUM, TRIQ IL-FOSOS	427/95	ARCHITECTURE	EDUCATIONAL	MUSEUM	1

**Scheduled in 2000**

Property Address	GN No	Category	Type	Feature	Level
RUINS, TRIQ IL-FOSOS	427/95	ARCHITECTURE	CIVIL	RUINS	1
RUINS - PARTLY RESTORED, TRIQ IL-FOSOS	427/95	ARCHITECTURE	CIVIL	RUINS	1
RESTORED HOUSE, TRIQ IL-FOSOS	427/95	ARCHITECTURE	CIVIL	DWELLING	1
SHOPS WITH OVERLYING HOUSES, TRIQ IL-FOSOS	427/95	ARCHITECTURE	CIVIL	SHOPS	1
FACADE WITH ARCHES, TRIQ MELITE BERNARDO	427/95	ARCHITECTURE	CIVIL	FACADE	1
FOLKLORE MUSEUM, TRIQ MELITE BERNARDO	427/95	ARCHITECTURE	EDUCATIONAL	MUSEUM	1
RUINS, TRIQ MELITE BERNARDO	427/95	ARCHITECTURE	CIVIL	RUINS	1
POINTED ARCHES, TRIQ SAN GUZEPP	427/95	ARCHITECTURE	MILITARY	ARCHES	1
ST. JOSEPH CHAPEL, TRIQ SAN GUZEPP	427/95	ARCHITECTURE	RELIGIOUS	CHAPEL	1
CAGLIARES PALACE, TRIQ SAN GUZEPP	427/95	ARCHITECTURE	CIVIL	PALACE	1
RUINS, TRIQ SAN GUZEPP	427/95	ARCHITECTURE	CIVIL	RUINS	1
2 UNNUMBERED HOUSES, TRIQ IZ-ZENQA	427/95	ARCHITECTURE	CIVIL	DWELLING	1
NO. 11, TRIQ IZ-ZENQA	427/95	ARCHITECTURE	CIVIL	DWELLING	1
HOUSE, TRIQ IZ-ZENQA	427/95	ARCHITECTURE	CIVIL	DWELLING	1
2 UNNUMBERED HOUSES, TRIQ IZ-ZENQA	427/95	ARCHITECTURE	CIVIL	DWELLING	1
CITTADELLA		ARCHAEOLOGY	AAI	FORTIFIED TOWN	A

**Scheduled in 1996**

Property Address	GN No	Category	Type	Feature	Level
TRIQ GUZE' ELLUL MERCER	016/96	ARCHAEOLOGY	AAI		0
TRIQ GUZE' ELLUL MERCER	016/96	ARCHAEOLOGY	AAI	BUFFER ZONE	0

**Scheduled in 1997**

Property Address	GN No	Category	Type	Feature	Level
TRIQ FORTUNATO MIZZI	008/97	ARCHITECTURE	RURAL	CISTERN	2

**Scheduled in 1998**

Property Address	GN No	Category	Type	Feature	Level
TA' MARZIENA, RABAT (GHAWDEX)	290/98	ARCHAEOLOGY	SAI	MEGALITHS	A
TRIQ L-IMGHALLEM	290/98	ARCHAEOLOGY	SAI	REMAINS	B
TA' MADLIENA, RABAT (GHAWDEX)	290/98	ARCHAEOLOGY		BUFFER ZONE	N/A
19, TRIQ SAN GORG, RABAT (GHAWDEX)	322/98	ARCHITECTURE	CIVIL	DWELLING	2
TRIQ IT-TELGHA TAL-BELT, RABAT (GHAWDEX)	322/98	ARCHITECTURE	RURAL/ MONUMENT	RESERVOIR/ MONUMENT	
TRIQ IT-TELGHA TAL-BELT, RABAT (GHAWDEX)	322/98	ENGINEERING	CIVIL	STEPS	2

**Scheduled in 2000**

Property Address	GN No	Category	Type	Feature	Level
UNNUMBERED PROPERTY, TA' GELMUS, RABAT (GHAWDEX)	404/98	ARCHITECTURE	RURAL	COUNTRYHOUSE	1
UNNUMBERED PROPERTY, TA' GELMUS, RABAT (GHAWDEX)	404/98	ARCHITECTURE	RURAL	COUNTRYHOUSE	1
CITTADELLA	765/98	ARCHAEOLOGY	AAI	STRUCTURAL REMAINS	B
CITTADELLA	765/98	ARCHAEOLOGY	AAI	TOMBS	B
CITTADELLA	765/98	ARCHAEOLOGY	AAI		

**Scheduled in 2000**

Property Address	GN No	Category	Type	Feature	Level
L/O KERCEM, MUNXAR, FONTANA, RABAT GOZO	856/00	AHLV	AHLV	WIED IX -XLENDI WATERSHED	N/A
WIED IL-LUNZJATA	856/00	ECOLOGY	BUFFER ZONE		3
WIED IL-LUNZJATA	856/00	ECOLOGY	AEI	VALLEY	2
WIED IL-LUNZJATA	856/00	ARCHITECTURE	RELIGIOUS	CHAPEL	1
OFF TRIQ PETRI	856/00	ARCHITECTURE	CIVIL	GATE	1
TRIQ PETRI	856/00	ARCHITECTURE	CIVIL	VERNACULAR	2
TRIQ PETRI	856/00	ARCHITECTURE	CIVIL	VERNACULAR	2
TRIQ XUXA	856/00	ARCHAEOLOGY	BUFFER ZONE		B

**Scheduled in 2001**

Property Address	GN No	Category	Type	Feature	Level
CITTADELLA AND PROMONTARY	83/01	AHLV	AHLV		N/A
CITTADELLA	83/01	ARCHITECTURE	MILITARY	CITADEL	1

**SAN LAWRENZ****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
FRESHWATER WETLAND AND BUFFER ZONE AT IL-QATTARA, DWEJRA		ECOLOGY	SSI	FRESHWATER WETLAND	1
IT-TORRI TAL-QAWRA, ID-DWEJRA	729/95	ARCHITECTURE	MILITARY	TOWER	1

**Scheduled in 1998**

Property Address	GN No	Category	Type	Feature	Level
NO. 2, TRIQ IL-WILEG, SAN LAWRENZ (GHAWDEX)	322/98	ARCHITECTURE	CIVIL	DWELLING	2

**SANNAT****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
NOS. 6-7, TRIQ DUN XAND AQUILINA	722/95	ARCHITECTURE	CIVIL	DWELLING	2

**Scheduled in 1997**

Property Address	GN No	Category	Type	Feature	Level
TA' DURELL	241/97	ARCHAEOLOGY	TERRESTRIAL	CART RUTS	B

**XAGHRA****Scheduled in 1994**

Property Address	GN No	Category	Type	Feature	Level
GGANTIJA TEMPLES	588/94	ARCHAEOLOGY	SAI	TEMPLES	A
MEGALITHS AND CAVES, GHAR TA' GHEJZU, 8TH SEPTEMBER AVENUE	588/94	ARCHAEOLOGY	SAI	CAVE	A
BROCKDORF CIRCLE, ALLEY OFF TRIQ TA' HAMET	588/94	ARCHAEOLOGY	SAI	BROCKTORFF CIRCLE	A
MEGALITH TEMPLES, SANTA VERNA	588/94	ARCHAEOLOGY	SAI	MEGALITHIC REMAINS	A
BUFFER ZONE FOR GGANTIJA TEMPLES	588/94	ARCHAEOLOGY	SAI	BUFFER ZONE	A
BUFFER ZONE FOR GHAR TA' GHEJZU	588/94	ARCHAEOLOGY	SAI	BUFFER ZONE	A
BUFFER ZONE FOR BROCKTORFF CIRCLE	588/94	ARCHAEOLOGY	SAI	BUFFER ZONE	A
BUFFER ZONE FOR MEGALITHIC TEMPLE AT SANTA VERNA	588/94	ARCHAEOLOGY	SAI	BUFFER ZONE	A
BUFFER ZONE FOR PREHISTORIC SETTLEMENT AT IN-NUFFARA HILLTOP	588/94	ARCHAEOLOGY	SAI	BUFFER ZONE	A
PREHISTORIC SETTLEMENT, NUFFARA	588/94	ARCHAEOLOGY	SAI	PREHISTORIC REMAINS	A

**Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
ROMAN VILLA	007/95	ARCHAEOLOGY	SAI	ROMAN VILLA	A
BUFFER ZONE FOR THE REMAINS OF A ROMAN VILLA	007/95	ARCHAEOLOGY	AAI	VILLA	A
NO. 39, TRIQ VICTORY SQUARE	722/95	ARCHITECTURE	CIVIL	DWELLING	2
IR-RAMLA IL-HAMRA (NADUR AND XAGHRA)		ECOLOGY	AEI	SAND DUNE	2
REMAINS OF BELANCOURT BATTERY (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	BATTERY	1
REMAINS OF RETRENCHMENT (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	RETRENCHMENT	1
REMAINS OF STATUE (NADUR & XAGHRA)	007/95	ARCHITECTURE	MONUMENT	STATUE	1
SALIENT OF RAMLA REDOUBT (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	REDOUBT	1
FOUGASSE (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	FOUGASSE	1
PART OF BLOCKHOUSE AND NADUR BATTERY (NADUR & XAGHRA)	007/95	ARCHITECTURE	MILITARY	BLOCKHOUSE/BATTERY	1
UNDER WATER OBSTACLE (SEA WALL) (NADUR & XAGHRA)	007/95	ARCHITECTURE	MARINE	SEA WALL	1
REMAINS OF PATHWAY (NADUR & XAGHRA)	007/95	ENGINEERING	CIVIL	PATHWAY	1

**Scheduled in 1998**

Property Address	GN No	Category	Type	Feature	Level
XAGHRA, GOZO	357/98	ARCHAEOLOGY	AAI		N/A
GGANTIJA TEMPLES, XAGHRA (GHAWDEX)	357/98	ARCHAEOLOGY	SAI	TEMPLE, CIRCLE, CAVE, MEGALITHS, WINDMILL AND BUFFER ZONE	A
TA' GHAIN LUKIN	462/98	ARCHITECTURE	RURAL	FARMHOUSE	1

**XEWKIJA****Scheduled in 1995**

Property Address	GN No	Category	Type	Feature	Level
NO. 1, TRIQ SAN GWANN BATTISTA	722/95	ARCHITECTURE	CIVIL	DWELLING	2

**Scheduled in 1998**

Property Address	GN No	Category	Type	Feature	Level
TRIQ TA' HAMET	462/98	ARCHITECTURE	RURAL	COUNTRYHOUSE	1
TRIQ SAN GWANN, XEWKIJA	582/98	ARCHITECTURE	CIVIL	DWELLING	2