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## **Feedback by *Wirt Ghawdex* on the GRDA's Regional Development Strategy Document**

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### **General Comments**

The rationale behind the *Regional Development Strategy for Gozo* presented by the Gozo Regional Development Authority (GRDA), namely that of presenting a general set of objectives with a view to outlining a direction for the Island, is a positive step that *Wirt Ghawdex* very much supports. The document also comes at a critical time when the Island is being subjected to the pressures of unscrupulous development that risks tearing the very fabric that lends Gozo its uniqueness.

Even though the document is written in high-level language (which is not an uncommon feature of documents of this nature), formulating a general vision for the Island represents an important - albeit preliminary - step in the shaping of the Island's future. Our hope is that by keeping Gozo's identity, heritage, and culture squarely in mind, this future will not end up being a grey and soulless cacophony of concrete cuboids devoid of the very characteristics that once endowed it with its distinctiveness. In this respect, *Wirt Ghawdex* welcomes the document's acknowledgement that "standards of living do not depend exclusively on income and the scale of productivity" (p. 8), and the statement that "Gozo requires a balanced approach where land use planning and sectorial policies are more in line with each other" (p. 8).

In general terms, the principal points we stress are the following:

1. The point of departure should be a clear and unequivocal acknowledgement that growth entails expansion and impact on surroundings, all too often accompanied by further environmental degradation. Aiming for a "balanced approach" is not a contentious phrase in itself as long as such balance is maintained sustainably. However, one must recognise that, at present, the scales are very much unbalanced: preservation is greatly disfavoured with far more weight being given to rapid and unsustainable development on the Islands. Therefore, a genuine effort to arrive at the balance that the document alludes to requires one to first introduce an imbalance that tilts the scales in favour of conservation. In view of the unfortunate prevailing planning policies, only then will the balance scales be "in line with each other". Within a wider context, the island of Gozo is very much susceptible to the effects of climate change, such that any and all development should only occur with this aspect in mind.
2. There is every reason to consider the grim urban sprawl in large sections of Malta - enabled as it is by planning strategies that are not fit for purpose - as a clarion call to urgent attention to the same policies' mindless application to Gozo.
3. Related to the above point, as long as planning policy remains exclusively within the remit of the Planning Authority (PA), and as long as the GRDA has no leverage on the shaping of Gozo's planning and development policy, then *Wirt Ghawdex* very much fears that the vision document will be facing a major obstacle that relegates all of its well-intentioned talk of sustainable development to paper. The principal detrimental force acting against Gozo's longterm interests is the PA's overriding policies that are not suited to the Island. In the lack of change to the PA's policies, Gozo will remain vulnerably exposed to further indefensible exploitation. While it is certainly encouraging to read that one of the goals is the safeguarding of "the green open spaces between villages which are Gozo's green lungs" and "planning and building a sustainable environment" (p. 14), in practice, Gozo continues to be subject to development in Outside Development Zones (ODZ) as per MEPA's 2006 ODZ rationalisation exercise as well as disproportionate building heights according to the interpretation provided in Annex 2 of the *Development Control Design Policy, Guidance and Standards* of 2015 (DC2015). The GRDA's role and

determination in changing the status quo of said policies remains unclear. In this regard, we do note one encouraging point in the *Vision Document for the Gozo Regional Development Authority*, namely that the GRDA's mission "is to strengthen Gozo's voice amongst policy makers and other governmental bodies, so as to ensure that policies and actions drawn up and projects proposed are adequate for the specific nature of the Gozitan ecosystem" (p. 9). We do hope that the above problems in existing policies will be amongst the very first to be challenged by the GRDA.

4. The GRDA's vision document itself carries a number of proposals that are not congruent with the spirit of sustainability it declares elsewhere. (A case in point is the resurrection of the airstrip proposal, which we will refer to again later.)

## **Comments pertaining to Specific Points in the Strategy Document**

In this section, we provide comments in regard to specific points in the document, proceeding in a sequential order.

### **Background**

Although the document does not refer specifically to the undersea tunnel in the goals and measures listed in the document, it is mentioned in the Background section and it may also be inferred from other goals under Infrastructure and Accessibility. *Wirt Ghawdex* has already expressed its serious reservations about the benefits such a major project would bring to Gozo, when considering its natural, economic and social impacts, and the preservation of the Island's unique identity referred to above in this document. In this respect, we remain opposed to the development of a tunnel between the Islands.

### **Priority Area 1: Gozo Spatial Planning and Sustainable Urban Development**

#### **General remarks:**

More emphasis needs to be placed on the issue of uncontrolled expansion of villages, leading to their becoming joined together via the erosion of green belts. This has already happened between *Nadur* and *Qala*, and *Sannat* and *Munxar*, and the same is occurring between *Għarb* and *San Lawrenz*, *Rabat* and *Munxar*, and between *Kerċem* and the hamlet of *Santa Lucija*. There needs to be an urgent realisation that the treatment of land solely as an investment instrument (abetted through certain existing financial/tax incentives), divorced from the actual needs and demands of the population, is leading to a catastrophic degradation of our very living spaces. As stressed earlier, a change can only come about via appropriate revision of existing development policies attuned to Gozo's setting, where the GRDA can serve a useful role.

**MI.3** We welcome the introduction of family parks. We stress that where there are already existing trees, these should be safeguarded.

**MI.8** Two aspects that are often overlooked are sound and light pollution (see also our Point (1) under Priority Area 7 - General Remarks). Such a sustainable construction fund should not fail to take into account these two aspects. Light pollution also ties in to *MI.10*, for improperly designed and excessive lighting results in a significant carbon footprint.

## Priority Area 2: Infrastructure and Accessibility

### General remarks:

A topic that should be emphasised is preparedness for a transition to electric vehicles, such as the introduction of charging stations (complementing the mention of their use in a car park in *MI.2*).

A measure that might ease traffic on the Island is the introduction of a financial scheme that benefits those who opt for scooters / small motorcycles over larger vehicles. While such a measure would not suit each and every individual, such financial encouragement could help persuade those who would be well-served by such a mode of transport. In addition, road rebuilding/upgrading projects should entail safe bicycle lanes.

**M2.1** We agree with the concept of e-ticketing which can help streamline the trip for regular commuters between the Islands.

**M2.2** This point speaks of an “environmentally friendly airstrip to link Gozo to Malta”. Using the term “environmentally friendly” in the context of an airstrip in such a small and already strained island as Gozo is an oxymoron. It was most surprising to find this proposal being resurrected in the present document, for such an undertaking does not seriously take into account the environmental impact this would have. *Wirt Ghawdex* is of the view that the minimal benefits of such a proposal are far outweighed by the detrimental impact on the surroundings. Beyond the issue of land use, such a project is very likely to have a significant adverse effect upon nearby communities, particularly on account of increased sound and light pollution. This contradicts the advertising of Gozo’s “peaceful and quite [*sic.*] ambience” (p. 23). Such a project can also result in other potential impacts, such as, for example, the disruption of bird species through bird control measures that are often employed (e.g. the use of insecticide/pesticide intended to remove food sources in the surroundings, the removal of seed-bearing plants, the use of sonic cannons, etc.). Gozo’s increased connectivity by sea, specifically via the addition of a fourth ferry to the ‘Gozo Channel’ fleet and the recently introduced fast ferry service, serves the Island well; an airstrip for a limited user-base is not warranted.

**M2.3** Upgrading, maintenance, and reconstruction of existing roads (where this is necessary, e.g. the road leading from Nadur to Mġarr) is a good measure. This is not to say that road infrastructure should take precedence over the natural environment and cultural heritage. We insist that the conservation of the latter two should remain the principal focus of policy. Upgrading should not come at the expense of further encroachment upon fertile land and loss of biodiversity (e.g. the proposed Marsalforn road, which is not justifiable), and the demolition of heritage, e.g. the house of character at Foreman street, Rabat (PA/03826/21), and the vernacular building in *Tal-Belliegħa* (PC/00050/17). Also, road upgrading projects should also incorporate water catchment strategies. (See Point (3) under Priority Area 7 - General Remarks.)

**M2.4** Expansion increases capacity, which is the intended outcome of this proposal. Increased capacity, however, induces further demand and increased use, such that in the long run one ends up facing the same problem of not being able to meet the (increased) demand and scaled-up requirements. The guiding principle should always be an acknowledgement and acceptance of the size limitations of our Island. While this presents challenges in terms of accommodating a large number of users (in any infrastructural sector; this also applies to Measure *M2.8*, for example), ultimately, we have to recognise that the Island’s smallness is, in fact, one of the key aspects that lend Gozo its unique character, distinguishing it from the larger Island and endowing it with its attractiveness and appeal to tourists. Continued expansion via sea/land reclamation and additional disturbance of existing bays will erode the very attributes that give Gozo its advantage. More specifically, we note that the introduction of berthing facilities in Marsalforn is likely to lead to a situation wherein boats take over bathers’ space; in this regard, one may refer to Xlendi as a typical unfortunate example.

**M2.5** Certain parts of Comino have come under considerable stress. A case in point is the Blue Lagoon and *Santa Marija* Bay, both of which see large masses of people in summer. A booking system coupled with the establishment of a maximum quota of visitors should be considered. (Such measures have been adopted elsewhere, e.g. Lampedusa.) Not only would this reduce the strain on Comino, it would also result in a much

better experience for tourists. Moreover, regulation and enforcement in regard to deckchair operators is direly needed, for shoreline public space is being occupied with umbrellas.

*M2.6* See comments pertaining to Measure *M2.4*.

*M2.7* We believe that, with proper thought, this proposal can be carried out sustainably. It could also encompass an enhanced hyperbaric medicine service. In view of both the popularity of diving (in particular technical diving) in Gozo, and the need for specialised treatment of chronic wounds, which are also found amongst the elderly (Gozo has a large elderly population) and exacerbated by diabetes (which is prevalent on the Island), an upgraded hyperbaric chamber would yield numerous benefits.

*M2.8* In the case of Mgarr, a present issue is that one of the traffic lanes is currently reserved for parking. A multi-level carpark in a different location coupled with a shuttle service to the ferry could represent a better solution for traffic management. This would possibly allow for the lane that is currently reserved for parking to become available for traffic flow. One must bear in mind that the introduction of additional roads carries a significant risk of induced traffic, and this could make the problem worse in the long run. Moreover, there is no available and sustainable avenue for the construction of such a road; it is very likely this would end up destroying one of the very few afforested zones in Gozo, namely the woodland beneath Fort Chambray, also jeopardising the latter's historical context.

### **Priority Area 3: Economic and Talent Development**

*M3.II* Incentives such as the reduction of property stamp duty should be treated with circumspection, for similar financial schemes have served to present Gozo as an exploitable asset, exacerbating its ruinous development.

### **Priority Area 4: New Economy**

*M4.4* This should also encompass projects that aim to improve the quality of Gozo's environment.

*M4.6* While we agree with this measure, we note that attracting such individuals rests very much upon the safeguarding of Gozo's character and quietness (as remarked in the very same measure), and therefore this measure is intimately tied to sustainable development practice (unlike what is being witnessed) and the preservation of Gozo's natural environment.

*M4.9* See also our comments pertaining to Measure *M2.7*.

*M4.10* See also the below comments in Point (2) under Priority Area 5 - General Remarks.

### **Priority Area 5: Sustainable Tourism**

#### **General remarks:**

(1) When considering an island of Gozo's size, the emphasis should be on quality rather than quantity. Despite discourse about a shift to quality tourism, unfortunately, to date, we have remained committed to a quantity metric. In this regard, we note that a tunnel between Malta and Gozo would perpetuate this unsuitable status quo.

(2) Gozo is an ideal location for conferences, both of an academic nature and otherwise. The organisation of such events in Gozo would benefit the Island's economy via the generation of quality tourism (by attending participants), positively affecting a number of business sectors. Organised properly, such events entail a low level of adverse impacts, and can represent an additional sustainable mode of tourism. A present issue is that there are no premises with adequate facilities that can cater for sizeable conferences.

(3) A niche but growing area of eco-tourism is dark sky tourism.<sup>1</sup> Individuals seeking dark skies to enjoy their passion for astronomy, astrophotography, and even the simple experience of rural quietness and nighttime darkness travel to regions that do not suffer high levels of light pollution. Gozo is well-placed to attract such tourism, especially on account of it being an island with clear views of a dark horizon (in some regions, e.g. Dwejra) when looking out to sea. However, this requires the preservation of Gozo's Dark Sky Heritage Areas and appropriate light pollution mitigation measures entrenched in a clear legal framework; in this regard, see our general remarks under Priority Area 7.

## Priority Area 6: Social Development

### General remarks:

*Wirt Ghawdex* agrees overall with the ideas presented in this section.

## Priority Area 7: Rural Development and Eco-Gozo

### General remarks:

#### (1) Light Pollution

There is no mention at all of the insidious and growing issue of light pollution, which has been shown to have three principal adverse impacts:

- (1) Disruption of nocturnal wildlife and ecology,<sup>2</sup>
- (2) Association with problems of human health,<sup>3</sup>
- (3) Erosion of the night sky heritage.

A scientific study on the night sky brightness of the Maltese Islands published in 2020<sup>4</sup> showed that Gozo was far less afflicted by light pollution than Malta, but the problem is significant enough that light pollution is encroaching upon Dark Sky Heritage Areas.<sup>5</sup> We are still in time to halt and even reverse the spread of light pollution on the Island, and the problem can be mitigated via simple and effective measures.

As an immediate measure that can be implemented without delay, we propose that **the lighting of public monuments, church domes, billboards, and facades should be turned off after a given hour of night** (e.g. past midnight). In many cases, all that this would involve is a simple agreement with the energy provider to switch off said lighting. In general, **lighting should follow the Standards of Low Impact**

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<sup>1</sup> A Google search will yield many results on the topic. The International Astronomical Union recently held a workshop on the subject which is available online at: <https://www.youtube.com/watch?v=hcwv1gOj1to>

<sup>2</sup> See, for example:

- Hölker et al., 2010. The dark side of light: a transdisciplinary research agenda for light pollution policy. *Ecol. Soc.* 15 (4), 13.
- Gaston et al., 2013. The ecological impacts of nighttime light pollution: a mechanistic appraisal. *Biol. Rev.* 88, 912–927.
- Bennie et al., 2016. Ecological effects of artificial light at night on wild plants. *J. Ecol.* 104, 611–620.
- Manfrin et al., 2017. Artificial light at night affects organism flux across ecosystem boundaries and drives community structure in the recipient ecosystem. *Front. Environ. Sci.* 5, 61.

<sup>3</sup> See, for example:

- Chepesiuk, R., 2009. Missing the dark: health effects of light pollution. *Environ. Health Perspect.* 1, A20.
- Cho et al., 2015. Effects of artificial light at night on human health: A literature review of observational and experimental studies applied to exposure assessment. *Chronobiol. Int.* 32 (9), 1294–1310.

<sup>4</sup> Caruana et al., 2020. Photometric mapping of the night sky brightness of the Maltese Islands. *Journal of Environmental Management*, 261, 110196.

<sup>5</sup> As defined in the 2006 Gozo & Comino Local Plan; see GZ-DARK 1.

## Lighting.<sup>6</sup>

The availability of relatively more efficient LED lighting has recently led to a harmful trend, in that this increased efficiency is mistakenly taken to mean that one can afford to install more and brighter lighting fixtures. This effectively cancels out the carbon-footprint reduction benefits that come with higher efficiency, while simultaneously increasing light pollution. Examples include the lighting that has been employed in some recent projects such as in *Triq Sant'Antnin*, Għajnsielem, where the LED lighting fixtures emit blue-rich light, are installed too close to each other, and have resulted in over-illumination. This has led to significant light scatter and trespass onto private residencies, while also contributing to the disruption the hedgehog community in the area. Should the same lighting scheme be implemented for the entire stretch of road leading to Nadur, this would be incredibly detrimental. (For the sake of clarity: the roadworks projects themselves were direly needed and very welcome by the communities and *Wirt Għawdex*; what is being criticised here is only the lighting system that has been adopted so far; had some thought been given to this aspect, serious issues could have been easily avoided, and the GRDA can be effective in this regard.) Bad lighting with very unfortunate consequences has also been employed by local councils. Two recent severe examples include the installation of an inconsiderate six-lamp pole in Għajnsielem Square and over-illumination in *Vjal it-8 ta' Settembru* in Xagħra. Such inconsiderate illumination would be avoided if proper regulation were to come into force.

In this respect, the GRDA should take an active role in regulating outdoor artificial lighting, especially seeing as how guidelines for the reduction of light pollution issued by the PA and ERA have remained stuck in draft stage for more than a year, and moreover rendered toothless given the lack of support by a legal framework. The GRDA can serve a very beneficial function by the setting up of appropriate regulation (in coordination with experts in the field), enforcement, and financial incentives.

### (2) Rubble walls

Restoration of rubble walls should be carried out using proper technique. Recent works on rubble walls in *Triq tas-Sruġ* in Xagħra have been topped with a thick layer of concrete and sparsely covered with stones. This is aesthetically incongruent with the landscape and also disrespectful of the traditional technique. The preservation of traditional dry stone walls is essential in our scenario, because they are a significant characteristic of our rural environment and serve an important ecological function.

Reference is also made to a number of other roads where rubble walls are being rebuilt, for example *Triq ta' Sannat* linking Sannat and Xewkija, and *Triq il-Qsajjem* linking Munxar and Xlendi. While such works are to be encouraged, it is rather sad that no new trees are being planted at intervals (see also comments on Measure M7.13). In *Triq il-Qsajjem*, mulberry trees that were planted many years ago have been retained, but there are long stretches along the road which can afford many more trees. Especially in view of the global climate crisis, the least we can do is plant new trees on a regular basis, and road-rebuilding projects present an opportunity to 'green' our island.

### (3) Water Catchment and Groundwater Extraction

*Wirt Għawdex* would very much like to see an effort at water catchment management. In road rebuilding/upgrading projects, this aspect should always be borne in mind. Our country is scarce in rainwater, and it is of paramount importance that the little rain we get is not allowed to go to waste. The GRDA can take on board and help bring to fruition the valley management master plan launched last year by PARKS Malta and the Energy & Water Agency, which highlights *Il-Wied tad-Dwejra*, *Il-Wied tax-Xlendi*, and *Il-Wied tal-Imgarr* as major catchment areas.

Groundwater extraction from a depleting water table is a worrying issue that has to be given urgent attention. Although there has been investment in more energy-efficient desalination plants with a view to easing off dependency on groundwater aquifers, more needs to be done to conserve groundwater reserves which, for many years, have not been allowed sufficient time to recover. In this regard, the GRDA should work closely

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<sup>6</sup> The standards may be viewed at: <https://www.licht-und-natur.eu/lpec-in-eeb/standards-of-low-impact-lighting/>

with the Energy and Water Agency and other bodies to establish a legal framework for comprehensive regulation and adequate enforcement.

**M7.13** The proposal for an afforestation programme is a much needed one, and local councils should be empowered and assisted to considerably improve green areas. This should not only consist of the potting of plants (i.e. the end-goal should not only be aesthetic enhancement), but also include tree planting. Moreover, trees should never fall at the mercy of development projects, a case in point being the recent proposal to widen Marsalforn road which entails the chopping of several trees. The priority should be to preserve existing trees and work around them, while adding new ones. (See also the above comments on Point (2) under Priority Area 7 - General remarks.)

**M7.15** The regeneration of Gozitan *pjazzas* and squares is a positive measure. Commercial activity should be controlled and not allowed to completely take over the *piazza* in question, as is happening in certain cases. The GRDA should work hand-in-hand with controlling bodies such as the Malta Tourism Authority for effective and sensible regulation and enforcement. This should extend beyond *pjazzas*; there has been haphazard encroachment by catering establishments in various places, as may be observed in Marsalforn and Xlendi, to mention but two examples.

## **Priority Area 8: Culture, Heritage and Arts**

### **General remarks:**

Culture and heritage should not be seen from an economic point-of-view only. Heritage is what constitutes our identity, distinguishes us from other countries, and makes us unique even on a regional level. Gozo's cultural heritage should continue to be protected in terms of the Cultural Heritage Act. The GRDA should therefore work hand-in-hand with the Superintendence of Cultural Heritage and Heritage Malta, as well as heritage NGOs and local councils that have been entrusted with the custody of heritage sites. It must be ensured that all work on heritage property is carried out by professionals in the field. It is clear that not all such 'conservation' projects are being undertaken by conservation professionals: a case in point is the recently renovated niche next to Xagħra's cemetery. More Gozitan youth should be professionally trained in the conservation aspect of heritage protection; there is a lack of human resources in this field.

Special policies tailored specifically for Gozo need to be considered in order to preserve village cores, important buildings, entire streetscapes and skylines. The skyline of the villages of Gozo is currently under siege on account of existing PA policies. An example of this is the village of Xagħra which is being disfigured with incongruent buildings. A discordant example of a new project being put forth at the expense of cultural heritage is the (afore-mentioned) recent proposal to ease bottleneck congestion via the demolition of a house of character at Foreman Street.

Massive developments are incompatible with our town and village character, and present policies do not safeguard sufficiently against its erosion. Moreover, no attention is being given to the aesthetic quality of new development. Specific planning policies are needed to truly protect our cultural and natural heritage.

Buffer zones of historic sites should be respected; recently, we have witnessed very worrying examples of development proposals in the vicinity of *Ġgantija* and traditional windmills.

The GRDA should steer Government towards the acquisition of important historical sites still in private possession. There are a number of these, such as the prehistoric sites of *Ta' Marżiena* in Rabat, *Borġ Għarib* and *l-Imrejżbiet* in Għajnsielem and *Borġ L-Imramma* in Ta' Ċenċ, the Punic site of *Ras il-Wardija*, and *Qbajjar Battery*.

Pressure should also be made to preserve and maintain Fort Chambray, which in 2004 was handed over to private hands and is presently in a pitiful state of neglect. Not only the fortification walls, but also heritage buildings such as the *Porvlista* and *Dar tat-Tabib* require proper maintenance.

**M8.5** While the conservation of sites such as Calypso Cave is very much encouraged and supported, we stress that this should not be accompanied by the establishment of so-called “interpretation centres” that ruin the pristine nature of such sites. Time and again, so-called centres have served as an excuse for their commercialisation through the introduction of souvenir shops, restaurants, or cafeterias, which kind of development *Wirt Ghawdex* is firmly opposed to.

*Wirt Ghawdex*  
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