

Development in Gozo

Position Paper on Development in Gozo submitted by the Gozo Business Chamber

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THE GOZO BUSINESS CHAMBER

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Introduction

On the 25 March 2021 the Gozo Business Chamber issued a statement on ‘Protecting Gozo from Unsustainable Development’.¹ Through this statement the Gozo Business Chamber supported the stance taken by Gozitan mayors and the Gozo Regional Council² in voicing its concerns on the unsustainable development currently happening in Gozo. It highlighted how:

the present rate of development is ruining the village cores of the island of Gozo, and the urban fabric which development does not take into consideration the needs and concerns of our local communities.³

It also highlighted that:

While the Gozo Business Chamber does support development, this should be sustainable in line with what can be accommodated within our localities, and which respects the urban texture and traditional character of our villages and towns.⁴

However, the Chamber prior to highlighting this position has spoken many times on various issues related to development.

The COVID-19 pandemic has shown that Gozo is overly dependent on certain sectors, which can leave it exposed once crisis hits, and which can lead to further unsustainable development. Apart from tourism, Gozo is very much dependent on construction and real estate⁵, more so than Malta.

The Construction industry contributes more than the double to the Gross Value Added, when compared to the main island of Malta. In 2019 this contributed for example to the Gozitan economy 9.71%, when compared to 4.03% to the main island of Malta.

On the other hand, the real estate sector in terms of % of Gross Value Added in 2019 contributed 11.84%, when in Malta the percentage contribution was 6.08%.⁶

This position paper which is being presented by the Gozo Business Chamber aims to summarise and highlight these issues while putting forward proposals to Government.

¹ The Gozo Business Chamber (25 February 2021), *Press Release: Protecting Gozo from Unsustainable Development* (online) : <https://gozobusinesschamber.org/wp-content/uploads/2021/02/GBC-Press-Release-250221.pdf> [accessed 20 March 2021].

² Fiona Galea Debono (23 February 2021), *United Gozo mayors ‘ignored’ over fears about construction* (online) : <https://timesofmalta.com/articles/view/united-gozo-mayors-ignored-over-fears-about-construction.853436> [accessed 20 March 2021].

³ The Gozo Business Chamber, *ibid.*

⁴ *Ibid.*

⁵ The Gozo Business Chamber (18 February 2021), *Making Gozo a Zero Carbon Economy* (online) : [Post COVID-19 – Strategic and Policy Document \(gozobusinesschamber.org\)](https://gozobusinesschamber.org/post-covid-19-strategic-and-policy-document) [accessed 21 March 2021].

⁶ National Statistics Office (21 December 2020), *Regional Gross Domestic Product: 2014-2019*, p. 4 (online) : https://nso.gov.mt/en/News_Releases/Documents/2020/12/News2020_206.pdf [accessed 5 February 2021].

Main Issues

The main issues relating to development pointed out by the Chamber are the following:

- The Preservation of the **Green Belts** around villages and towns.⁷
- The **conservation of urban conservation areas**.⁸
- The quality, height, and intensity of buildings in development areas that are outside urban conservation areas.⁹
- The **capacity for further development in Gozo**, and what studies are being done to determine the relation between demand and supply vis à vis the approved units and the pressure these are putting on the island 's infrastructure.¹⁰

Presently Development in Malta and Gozo is regulated through a three-tier system:

- **The Strategic Plan for the Environment and Development (SPED)**. This is a strategic document which contains a number of generic policies that provide a general direction on the environment and development in Malta and Gozo. The SPED was published in 2010 and took the place of the Structure Plan which was published in 1990. This is presently being revised, which process is going to take around two years.
- **Local Plans** which cover different regions of Malta. Gozo has a specific plan which was published in 2006. This was intended to cover a ten-year period.
- **The DC15 policies for areas within the Development Zone**, and the **Rural Policy and Design Guidance** for rural areas. Other specific policies regulate specific areas such as for example outdoor catering areas.¹¹

The present situation clearly shows that a thorough revision of these policies is required. However, this is a detailed process which will require several years.

In the meantime, the present situation calls for the formulation of certain measures, which should at least redirect and channel the present unsustainable development, into a more sustainable form of development, while also initiating a long-term process which should ensure and formulate the criteria for long-term sustainable development in Malta and Gozo.

⁷ The Gozo Business Chamber (8 October 2019), *Press Release: The Gozo Business Chamber's proposals for the Budget 2020* (online) : [GBC-Press-Release-081019.pdf \(gozobusinesschamber.org\)](#) [accessed 20 March 2021]

⁸ The Gozo Business Chamber (2020), *Post COVID-19 Strategic and Policy Document*, p. 7 (online) : [Post COVID-19 – Strategic and Policy Document \(gozobusinesschamber.org\)](#) [accessed 21 March 2021].

⁹ Ibid., 8.

¹⁰ These points were highlighted by Perit Edward Scerri in his submission on behalf of the Gozo Business Chamber during an online debate organised by the Gozo University Group, 'L-Iżvilupp u l-Futur ta' Għawdex' on the 18 March 2021.

¹¹ Ibid.

Measures being Proposed by The Gozo Business Chamber.

The Measures being proposed by the Gozo Business Chamber are both in the **long term** and in the **short term**.

In the **long term**:

- **In revising the SPED the overarching priority should be the diversification of the Gozitan economy** by using areas which are not land intensive. When land needs to be used, this should be done by regenerating already industrialised or disturbed areas.
- The Government should **initiate the process for the revision of the Local Plans** in consultation with society in Gozo. The contribution of Local Councils to this effect is of paramount importance. They should not be merely consulted but should be taken on board as an integral part of the revision process.
- In the long term **permitted development should take into consideration the intensity of development** which the street, neighborhood and locality are capable of accommodating, including the impact on infrastructure, on street parking and the quality of life in general.
- The Planning Process should also look into the fact that **when new roads are being planned, this should also include the provision of services so as to ensure the inclusion of all services (electricity, telephony, internet) underground.**

While Construction will continue to sustain to a certain point the Gozitan economy, efforts must be made to create new niches which would help the sector move from the current building of blocks of apartments which are ruining village cores to more sustainable practices which would make it more profitable to restore old houses rather than tearing them down to build blocks of apartments which are having a detrimental effect on the Gozitan community. To this end the Chamber is proposing that in the short term the Government should implement the following measures:

- Creates schemes **specific for Gozo** targeted towards the renovation of old houses while making them more energy efficient. Incentives should be intrinsically tied to making a building more energy efficient and lessening its carbon footprint. Specific schemes could **identify for example particular areas, such as for example in the city centre of Victoria, where a number of old buildings are currently unused and being left in a dilapidated state.**
- **Houses which are bought to be renovated and lived in, and not redeveloped into apartment blocks would fall within a reduced property tax regime.** Though this should apply both to houses within and outside the urban conservation areas (UCAs), **a more favourable tax regime should apply on houses outside UCAs.** Due to the present policies, the impact of the replacement of houses with large apartment blocks, is greater in development zones outside the UCAs.
- **Enforcement of particular measures.** This should include specific measures such as for example ensuring that apartments **which are not finished have their outside doors, windows and balcony railings installed.** However, this also calls for the **enforcement of existing measures** such as ensuring that the: (i) air conditioning units are not located on the outside of buildings unless they follow the existing design guidelines; (ii) the installation of photovoltaic modules and solar water heaters follow the existing guidelines when they are installed, including the visual impact created due to the angularity, and the reflectiveness of their material; and that (iii) no services are allowed on the front elevation of a building, which is visible from a public space.

In the planning process

- **Consider further the involvement of Local Councils** by: (1) devolving decision making on planning applications to Local Councils (Gozo can be a testing ground on this proposal); (2) give **Local Councils and Stakeholders a proper voice to determine Neighbourhood Plans**, and curb excessive development through **mandatory Public Exhibitions by developers to demonstrate plans**. This process however should be a gradual one, equipping Local Councils with the required human and technical resources in the process, and starting with certain applications first (for example). In developing this process the required safeguards need to be put into place to ensure that the process is a transparent and objective one, which should in effect ensure a community based approach, which is however objective, and follows a due process. This should ensure that the rights of everyone i.e. both applicants and the community are respected.
- Introduce **stricter and more stringent design guidelines**. This should lead to the formulation of policies regulating all areas, including policies regulating the design of facades. This would include for example: (a) **having similar facades which are made in stone, while preserving existing and authentic houses of character**; and (b) **considering having specific designs and colour coordination schemes assigned for identified areas**. Overall, the emphasis should be on quality buildings rather than quantity.
- **Height limitations should not be regulated through a blanket policy**. In allowing for particular heights one should consider a **transition mechanism in line with existing buildings in the area**.
- **Justifications provided in determining applications in rural areas should be scrutinised effectively by the Planning Authority**, ensuring that what is being required is justified for the purposes being sought.

Legislative Changes

In line with the incentives to be provided to restore old houses, the Government should consider facilitating the acquisition of such properties.

Many old properties are not being acquired because during the process of their acquisition prospective buyers do not find a title of ownership for such properties. These would have been transferred from generation to generation, within the same family. Even the owners would not be aware that such a title does not exist. The legal case behind the registration of property in Nadur, Gozo,¹² has further shown the need for clarity on the title of ownership.

To this end the Government should consider **having a fixed time period, by which if the property would have been owned by the same proprietors and has not been contested, the owners would qualify for a title of ownership**. Obviously, the legal ramifications of such a legislative change would need to be considered.

¹² Sarah Carabott (4 March 2020), *Nadur residents told land they occupy does not belong to them* (online) : <https://timesofmalta.com/articles/view/nadur-residents-told-land-they-occupy-does-not-belong-to-them.775640> [accessed 24 March 2021].

Conclusion

The present situation calls for a rethinking of the current state-of-affairs, which has become unsustainable. This calls for an overhaul of the planning process. Local Councils should have a more determining role in deciding applications, as they reflect the needs and the requirements of our local communities, while equipping them with the required resources in the process. The emphasis should be on quality and not on quantity, ensuring that the needs of our local communities are met without in any way impinging on their quality of life.
