



GRDA

FEEDBACK STATEMENT

**PARTIAL REVIEW OF THE GOZO AND COMINO LOCAL
PLAN 2006 FOR QALA (HONDOQ IR-RUMMIEN)**

ISSUED BY THE
GOZO REGIONAL DEVELOPMENT AUTHORITY

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Partial Review of the Gozo and Comino Local Plan 2006 for Qala (Hondoq ir-Rummien)

Feedback by the Gozo Regional Development Authority

1. Preamble

The consultation published on 20th September 2023, by the Planning Authority (PA), entitled 'Partial Review of the Gozo and Comino Local Plan 2006 for Qala (Hondoq ir-Rummien) Phase 1' has as a central aim the prohibition of any form of development within the area of Hondoq, and the site being dedicated for afforestation projects.

This need to partially review the Gozo and Comino Local Plan 2006 for Qala, more specifically for Hondoq ir-Rummien, emerged following attempts to develop the area of Hondoq ir-Rummien.

Despite decisions by the Planning Authority and the Court to refuse development, the area of Hondoq ir-Rummien remains under 'threat' of development, since the existing local plan approved in 2006, encourages sensitive development at the old-quarried area at Hondoq ir-Rummien. More specifically, policy GZ-Qala-4, outlines that:

*"Development, within the boundaries of the Hondoq ir-Rummien, as indicated on Map 14.8-E, for Tourism and Marine related uses, is to focus on sensitively designed, high quality and low density buildings that blend into the landscape."*¹

In light of these existing policies, the government felt the need to partially review the Gozo and Comino Local Plan 2006 for Qala, Hondoq ir-Rummien, to protect the area from any form of development. Given that this area around Hondoq ir-Rummien, which is easily visible from nearby Comino and the route taken by the Gozo ferries, is sensitive from an environmental and landscape point of view, and is one of the few areas accessible for bathing and other marine related activities, such proposed review of the existing policies will have an impact on the island of Gozo.

2. Context

The Gozo Regional Development Authority (GRDA) has been set up to formulate, streamline, and help in the implementation of regional policies to ensure Gozo's sustainable development. One

¹ Gozo and Comino Local Plan, as approved by MEPA, 2006.

of the main roles of the Authority is to ensure that the 'development' of the region remains true to the long-term sustainable requirements of Gozo, its social fabric, economy, inhabitants, and natural environment. This role encompasses a wide array of domains that have an influence on the sustainable development of Gozo, ranging from culture, heritage, and social development to spatial planning and the use of land.

The GRDA considers sensible use of land and the natural environment as a key to Gozo's sustainable development. It strongly believes that the key to Gozo's future is the persistent adoption of a formula that maintains a sustainable and balanced territorial development through optimal use of land and the preservation of landscape and Gozitan traditional urban and rural features.

The GRDA's overarching objective for spatial planning and development in Gozo is to attain the following strategic goals, namely safeguarding and building an ecologically sustainable environment which contributes positively to the economic prosperity and quality of life of present and future generations; achieve a natural network of open spaces for residents and visitors alike in which the island's biodiversity can thrive; and build on Gozo's identity as an 'Island of Villages'.

As an 'Island of Villages', characterized by its "smallness", peripherality, and a more rural dimension than Malta, the symbiosis of land and environment is the bedrock for all growth on the island, particularly given its size limitations. Should development not be properly planned in Gozo, the risk would be that of losing the island's identity and distinctiveness. These distinctive characteristics are a strength that Gozo should build upon to effectively become a destination of excellence. Gozo's distinctiveness from the mainland enhances the island's attractiveness and is a source of added value. This also contributes to the quality of life of Gozo's residents.

3. Feedback by the GRDA

True to its vision and principles outlined above, the GRDA agrees with the objectives proposed to guide the Planning Authority in its review of the Gozo and Comino Local Plan. The proposal to prohibit any form of development within the environmentally sensitive area of Hondoq ir-Rummien aligns with GRDA's vision for the island of Gozo, which entails preserving the island's distinctiveness and safeguarding its environment and biodiversity.

Looking into each of the proposed objectives, the GRDA would like to present the following observations:

- i. Objective 1: Given that policies GZ-Qala-3 and GZ-Qala-4 are separate policies, different from each other, it is imperative to delineate on policy map 14.8-E the specific areas to which each separate policy is applicable. This ensures that each area is clearly identified as separate and distinct from the other area, and ensures accurate application of the respective policies.
- ii. Objective 2: Considering that the existing policy GZ-Qala-4 encourages development at the old-quarried area at Hondoq ir-Rummien, it is crucial that this policy is revised

such that any form of development on this land is prohibited. The GRDA commends the proposal to allocate the old quarried site for afforestation. This enables the area which has been scarred by extraction activities in the past to be sensitively improved and embellished. This proposal is in line with the Gozo Regional Development Strategy² which encourages afforestation programmes to achieve a greener Gozo. In this regard, the use of native species and compatibility with the local climate should be prioritized.

Moreover, given that the area earmarked for afforestation is sensitive from an environmental and landscape point of view, any works and activities to afforest the area should respect this sensitivity and the high quality nature and landscape qualities of Hondoq ir-Rummien and the surrounding area. These considerations along with other important considerations such as water catchment and storage for irrigation purposes should be reflected in the guidelines on what afforestation entails in terms of works and activities.

iii. Objective 3: All provisions in the Gozo and Comino Local Plan of 2006 that are relevant/applicable to the area of Hondoq ir-Rummien should be consistent with objectives (1) and (2), that would guide the review process. Thus, GRDA fully supports objective (3) proposed by the PA, which proposes that all other provisions in the Gozo and Comino Local Plan which are deemed to run counter to objectives (1) and (2) discussed above, are amended, or deleted.

In addition to the above comments, the GRDA recommends that PA also reviews and revises policy GZ-Qala-3. Whilst agreeing in principle with the policy's existing objectives, the GRDA recommends that a greater emphasis be placed on the rehabilitation of the area, which is currently used as a car park, and which currently lies in a relatively dilapidated state. Rehabilitation of such damaged landscape should retain public access to the beach, whilst respecting the area's sensitivity from an environmental and landscape point of view. Meanwhile, the GRDA recommends a clearer definition of the existing proposal to provide certain beach amenities. The GRDA recommends that this proposal is restricted only to the most basic facilities, such as litter disposal facilities. Other unnecessary facilities, such as showers and changing rooms, should be discouraged.

4. Concluding Remarks and Reference to the Regional Impact Assessment Studies

The GRDA commends this initiative by the Planning Authority to partially review the Gozo and Comino Local Plan to safeguard Hondoq ir-Rummien from any development. Given that the area is sensitive from an environmental and landscape point of view, the GRDA reiterates the importance that this partial review of policies complements this sensitivity.

² https://grda.mt/wp-content/uploads/2023/09/GRDA_RDS-Document_A4_VH_2023_Web-1.pdf.

The GRDA also encourages discussions with the aim that such review of the Gozo and Comino Local Plan possibly extends to other areas which are environmentally sensitive, and which might be under threat of development or human interventions that negatively impact the environment and Gozo's distinctive character. In this regard, the GRDA also advocates for discussions aimed at ensuring that the Gozo and Comino Local Plan of 2006 as well as any other policies which direct spatial planning and development in Gozo are aligned with the shared vision of Gozo as an 'Island of Villages', such that the island's heritage and its distinctive characteristics are preserved and enhanced.

Furthermore, the GRDA examined the proposed policy revision in view of its Regional Impact Assessment (RIA) function³, as per Article 8 (1) (f) of the GRDA Act.⁴ In line with the established methodology, the GRDA has initiated a Screening Process to determine whether an RIA study is required. Based on an initial analysis, the proposed partial review of the Gozo and Comino Local Plan 2006 for Qala (Hondoq ir-Rummien), does not require a full Regional Impact Assessment Study.

GRDA looks forward towards additional consultations, and remains available for any clarification, or further consultations via: info@grda.mt

³ <https://grda.mt/regional-impact-assessment-online-tool/>.

⁴ <https://legislation.mt/eli/cap/600/eng/pdf>.



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