# **Camping, Caravanning and Picnicking Sites on the Maltese Islands**

**Discussion Paper** 

January 2021

# Contents

Gl	lossary	5
Sc	cope	6
1	Introduction	7
	1.1 The SPED 2015 Strategic Spatial Guidance for Recreational Land Uses	7
	1.2 Introduction: Definitions	10
2	Camping and Caravan Sites	11
	2.1 Land Use Considerations	11
	2.2 Current Policy Implementation	11
	2.3 Earmarking in Local Plans	12
	2.3.1 Central Malta Local Plan	13
	2.3.2 South Malta Local Plan	13
	2.3.3 North West Local Plan	13
	2.3.4 Gozo and Comino Local Plan (Camping only)	14
	2.3.5 Marsaxlokk Bay Local Plan (Camping only)	14
	2.4 Camping and Caravanning: Planning Permits and Environmental Management Tools	14
	2.4.1 Summary Schedule Permitting For Temporary Land Use	14
	2.4.2 Management Plans	15
3	Picnicking	16
	3.1 Land Use Considerations	16
	3.2 Sites earmarked in Local Plans	17
	3.2.1 Central Malta Local Plan	18
	3.2.2 South Malta Local Plan	18
	3.2.3 North West Local Plan	18
	3.2.4 Gozo and Comino Local Plan	19
4	Food for Thought:	20
	4.1 District Level Regional and Urban Parks	20
	4.2 Factors affecting Camping, Caravan and Picnicking Sites	22

	4.2.1 Feasibility	22
	4.2.2 Time of Stay	23
	4.2.3 Site Management	23
	4.2.4 Environmental Tolerance of Sites	24
	4.2.5 Camping and Caravanning: Impact Differences	26
	4.2.6 Transport and Access	27
	4.2.7 Education and Back to Nature Lifestyle	27
5 Concl	usion	29
Append	ix A: Local Plan Policies for Camping, Caravanning and Picnicking Areas	31
Cen	tral Malta Local Plan (2006) Policies	31
	Camping and Caravanning Policies	31
	NA04 Protection of the Natural Coastal Area	31
	NA05 Improvements at Bahar ic-Caghaq	32
	Rambling and Picnicking Policies	33
	CG26 Promotion of Heritage Trails and Walkway Routes	33
	CG27 Environment Management Plans	34
	MO07 Victoria Lines Heritage Trails	35
	MO08 District Level Recreational Area	36
Nor	th West Local Plan (2006) Policies	37
	Camping and Caravanning Policies	37
	NWRE 2 Touring Caravan and Camping Sites	37
	NWML 19 Anchor Bay	39
	Picnicking Policies	41
	Country Parkways	41
	NWRE 5 Country Parkways	41
	NWRE 7 Picnic Areas	42
	NWRE 8 Heritage Trail at the Victoria Lines	43
	NWMT 10 Recreational Area	44
	NWBU 1 II-Buskett Action Plan	44
Sou	th Malta Local Plan Policies	46

Camping and Caravanning Policies	46
SMTO 03 Camping and Touring Caravan sites	46
SMMS 08 St. Thomas Bay Coastal Recreation Area Action Plan	47
Picnicking Policies	48
SMRE 01 Provision and Retention of Recreational and Sports facilities	48
SMRE 02 Walking & Cycle routes and heritage trails in urban and rural areas	49
SMIA 12 District Park along the Cottonera Lines	49
SMIA 13 National Parks	51
Gozo and Comino Local Plan (2006) Policies	51
Camping Policy Comino	51
Rambling, Cycling and Picnicking Gozo	51
North Harbours Local Plan (2006) Policies	54
Walking, Cycling and Picnicking Trails	54
NHRL06 Walkways/Heritage Trails/Cycle Routes	54
Marsaxlokk Bay Local Plan (1995) Policies	55
Camping Site	55
MV05 Camping Site at II-Mara	55
MA03 Recreational Footpath System	56
ML02 Coastal Footpath	56
Appendix B: Local Plan Maps for Camping, Caravanning, and Picnicking Areas.	57
Appendix C: Existing 'Guidance for Caravan Sites Upgrading' in SMLP 2006	65

# **Glossary**

EIA Environmental Impact Assessment

ERA Environment and Resources Authority

Informal Leisure activities which are not undertaken on a formal organised Recreation basis and are generally carried out by individuals or groups on an

intermittent basis with a minimal requirement for supporting

facilities1

MPA Marine Protected Area, designated as SAC or SPA further to the

below mentioned legislation

SAC Special Area of Conservation as per Flora, Fauna and Natural

Habitats Protection Regulations (S.L. 549.44)<sup>2</sup>

SEA Strategic Environmental (Impact) Assessment

SPA Special Protection Area as per Conservation of Wild Birds

Regulations (S.L.549.42)<sup>3</sup>

SPED Strategic Plan for Environment and Development, 2015

TIS Transport Impact Assessment

TM Transport Malta

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<sup>&</sup>lt;sup>1</sup> North West Local Plan as approved 2006, p.285 < <a href="https://www.pa.org.mt/en/local-plan-details/north-west-local-plan">https://www.pa.org.mt/en/local-plan-details/north-west-local-plan</a> (last accessed 8 January 2021)

<sup>&</sup>lt;sup>2</sup> Protected areas designated pursuant to this legislation are published as Government Notices <sup>3</sup> Ibid.

## Scope

The scope of this Discussion Paper is to elicit public feedback on the current policy framework, particularly related to land use, for camping, caravanning and picnicking. The public is further encouraged to inform of the type of facilities required for possible inclusion on already designated sites for the respective activities, as well as how management of these sites may be foreseen. Views on the existing 'Guidance for Camping and Caravanning' (Appendix C) are also being solicited.

Through this Paper, land owners of areas/sites earmarked in Local Plans for the purposes of the aforementioned recreational activities, are also invited to submit an expression of interest to have such land rehabilitated accordingly, delineating the role they may envisage playing in the management of their site for these purposes.

Any innovative ideas, recommendations, views, opinions, suggestions or proposals received by the Government further to this Discussion Paper will need to be evaluated, and if deemed acceptable, will be taken into consideration in the eventual way forward which may be adopted by the Government on this topic.

#### 1 Introduction

This paper delineates the existing framework, local plans and policies which cater for camping, caravan and picnicking sites. Issues to be considered in the implementation and development of already designated sites for these purposes will be highlighted. For ease of reference, the policies referred to in this paper are included in Appendix A, whilst the related maps are included in Appendix B. Appendix C includes the existing 'Guidance for Caravan Site Upgrading' as was approved in the Local Plans.

# 1.1 The SPED 2015 Strategic Spatial Guidance for Recreational Land Uses

The Strategic Plan for Environment and Development (SPED, 2015) Section 'Vision for the SPED', para. 1.27 clearly defines the vision for the rural area. This is identified as continuing to sustain the livelihood of farming communities, and therefore targets agriculture as a primary land use whilst also ensuring that the rural area shall,

'...remain a place where people can escape from daily urban life, visually pleasant and rich in biodiversity; and shall become better green lungs with less buildings and dereliction, more accessible and more resilient to the impacts of climate change.' (SPED 2015, p. 6)

The SPED thus identifies outdoor recreation as an ancillary primary land use in the rural area. Agriculture is guided by SPED Rural Objective Policy RO1 and is the prime legitimate land use as per current policy. On the other hand, recreation is classified as the informal use of this land and is guided by SPED Rural Objective Policy RO 2.

The SPED protects the right to the enjoyment of open, natural and undeveloped space by the general public. This is in effect the main principle emerging from this document in its guidance on recreation. It emphasizes prioritising informal rather than formalised recreation. This implies that open space recreation is fully supported through current strategic policy subject to conditions followed in the interest of integrating the SPED's recreation policies with the protection afforded also to agriculture, the environment and cultural heritage within the rural or coastal areas.

The SPED also includes policies that guide recreational land uses within the urban, rural and coastal areas in more detail.

The primary emphasis of the SPED policies on recreation is on the safeguarding of public open spaces for public enjoyment and access. Considering the high population density and limited public open space, the SPED policy framework is based on a number of principles that include:

- the 'containment principle' and
- the 'sequential approach principle'.

These principles which are well explained within the SPED document, effectively try to limit development to within the urban areas and avoid unnecessary development

sprawling outside the development zone. This is based on a 'sustainability approach' which protects the natural rural and coastal areas for their pristine setting and characteristics. These principles imply minimum sprawl, intervention, disruption and alteration of the natural environment and are specifically geared towards accommodating the most necessary and legitimate uses such as agriculture and informal open space enjoyment within an environmental protection framework.

A comprehensive and integrated approach to land use also assists in reducing as far as is possible conflict between particular land uses. This is also true for recreational land uses that if not planned well, may conflict with other uses, and between themselves. This is especially so if land is allocated through an ad-hoc rather than a planned and strategic approach.

To observe the more specific policies in the SPED 2015 that guide decision making on recreational land use, the following policies are particularly relevant.

The SPED (p. 5) describes the rural areas as 'characterised by low population densities, agricultural activities and natural resources. As an example of the limited nature of the Maltese Islands rural areas, woodlands according to the SPED account for less than 1%'. Thus, more afforestation is required. The SPED therefore calls for a reduction of land uses which might have an 'adverse impact on the distinct characteristics of rural areas resulting in the possible reduction of open countryside, damage to natural habitats or wildlife, increasing conflicting activities and scarring of the traditional landscape'. Other threats include the likelihood of increased dumping of wastes, indiscriminate blocking of access and other malpractices that may be brought about by new unmanaged alternative land uses.

New additional recreational uses, apart from the sites that have already been identified in subsidiary plans such as Local Plans, including recreational land uses appertaining to camping, caravanning and even picnicking, could intensify the risks of conflict within protected rural areas if unplanned, and subsequently not monitored and adequately enforced. One such area of activity is agricultural land use and the related legally protected resources such as soil and rubble walling. Camping and caravanning increase the risk of added disturbance to such safeguarded resources. The SPED prioritises the effective continuation of agrarian activity. This is expressly the case as this agrarian activity also indirectly sustains the traditional landscape characteristics of rural areas. SPED para. 2.50 clearly highlights how existing problems in rural areas, the same may be argued for coastal areas, may be compounded even further through the inappropriate location of new land uses as follows:

<sup>&#</sup>x27;...particular rural areas are under threat of degradation by the large number of people they attract, mainly for recreational purposes. The absence of suitable and practical management measures intensifies this problem.' (p. 15)

To this effect, the SPED Rural Objective Policy RO 2 promotes mostly informal recreation and protects the open public access to the countryside. It also specifically requires that recreational activities are compatible between themselves and with other land uses thereby reducing possible conflicts between land uses.

Regarding the coastal zone, the SPED divides the coast into predominantly urban coast and predominantly rural coast. The coast is therefore not a limitless resource but a finite one and conflicting land uses are high within the coastal strip. Much of the coast is already not available for informal recreation due to physical access restrictions, so the limited spaces that are still available for swimmers, mainly popular beaches and bays, already have severe limitations and as such need to be protected primarily for such uses. Conflict between uses is high on the coast especially during the summer months, where the demand for access to the coastal locations increases substantially, sometimes leading to conflicts between swimmers, boating enthusiasts and caravanners apart from other activities. Caravanning, when located in a coastal location and close to the sea space obstructs access and views to swimmers and promenade or seaside walkers. It is in these areas that conflict and to some extent confusion from overuse of the limited space arises to the detriment of legitimate users of open space. Such conflict needs to be reduced and not increased further. To this extent, the SPED prioritises above all the access needs of the pedestrian public as the legitimate users of the coast. As such the hindrance to such access is to be avoided. Designated caravan sites should not be located directly on the promenade, coast road or coastal strip but should be planned further inland within suitable locations, whilst allowing for access along the coast.

Similar to the Rural Objectives, the SPED Coastal Objectives through SPED Coastal Objective Policy CO 3, also protect existing coastal recreational resources and public accessibility of the coast and state clearly that the provision of new recreational facilities does not restrict access or interfere with physical and visual public access to the coast or in a manner that has an unacceptable adverse impact on protected areas, species or areas of high landscape sensitivity.

The SPED Thematic Objective Policy TO 5.1 refers to the designating of new formal recreation facilities areas in the Rural Area as National Parks which are outlined in Thematic Objective Policy TO 5.2. This policy however states plainly that there should be no consideration of deleterious and incompatible land uses in these areas. This would imply that there is a preference for car free picnicking/light single tent camping and not for fully fledged camping and caravanning sites.

#### 1.2 Introduction: Definitions

This Paper seeks to further investigate the current policy framework, particularly in relation to land use, of three types of popular recreation: camping, caravanning, and picnicking. It is noted that although these activities have been grouped together here, their characteristics and implications on land use vary.

Carvanning is understood as an outdoor recreational short-term activity using a structure designed or adapted for temporary human habitation that is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or by trailer and any motor vehicle so designed). This also includes campervans. The caravan is *not* a fixed structure, but one that may be moved.

Camping is defined as an outdoor recreational short-term activity involving day/overnight stays away from home in a temporary shelter within a tent. Typically, this involves campers leaving developed areas to spend leisure time outdoors in more natural spaces for enjoyment by making temporary living accommodations or preparations to sleep by erecting a tent that is not fixed but dismountable. This activity does *not* involve open-flame cooking on site, unless facilities for such are provided within the camping site itself.

*Picnicking* is a daytime excursion or outing in which the participants carry food and drink with them and share and enjoy a meal in the open air within natural spaces. This activity does *not* involve open-flame cooking on site.

## 2 Camping and Caravan Sites

#### 2.1 Land Use Considerations

Camping and Caravan Sites form part of the recreational land uses zoning category. The provision of recreational land use is socially important to allow for an improved quality of life especially with limited open spaces available for such purposes. However, recreational land uses need to be planned well and must be justified, both in terms of demand as well as feasibility and location. This will allow for a varied provision of open space for all the required land uses. Such considerations are therefore based on a number of main planning premises.

The first is to limit conflict between recreational land uses themselves. Recreational land use, particularly for camping and caravanning, takes up substantial space, and space is restricted. A number of recreational uses may conflict with the requirement of open public space provision.

The second planning premise is to control the effects of such recreational land use in order to reduce their impact on the surrounding environment including fauna and flora, on legitimate agricultural and coastal activities (swimming, open space enjoyment of the promenade and water edge etc) and also to limit any possible visual intrusion, noise or other pollution such as the creation of unwarranted waste.

The third planning premise is that it is better to have designated sites for camping and caravanning then ad-hoc roaming and stopping, since designated sites may be better managed and monitored, improving and guaranteeing quality, whilst a roaming 'free for all activity' is difficult to monitor and is more likely to cause environmental harm.

#### 2.2 Current Policy Implementation

With respect to the first planning premise, the main policy direction followed thus far has been for smaller and scattered sites for land intensive recreational uses including camping and caravan sites, rather than large sites that would limit and conflict with other recreational uses. Such an approach is concomitant with limited land space that needs to cater for and address multiple land use requirements and cannot afford widespread land take up for any particular land use. It is crucial to note that so far, sites designated and utilised for caravanning and camping have been located on public land, i.e. Government owned.

The decision to tend towards smaller and scattered sites is also essential to control the impact of such activities in one specific area. Larger sites have greater impacts and the increased density of caravans, for example, could engulf the surroundings both visually and physically. Scattered smaller sites on the other hand, although providing for a wider availability of sites, are more difficult to monitor and manage. Scattered provision of smaller sites also involves wider cooperation efforts from a

number of Local Councils with Government to ensure that the quality and management of these sites is acceptable. Furthermore, scattered sites imply greater servicing needs, whilst a larger site may concentrate servicing demand in one location. This is a very sensitive concern when considering the element of formalisation of the countryside required for services provision. Scattered smaller sites implies the need for such formalisation at each site, and thus increases the impact and cost attached to service provision.

Whereas over the past years there has been an increase in interest for caravanning and camping, this demand is mostly based on local tent campers or caravan owners that search for a sea-side location. Camping in the rough however, is increasingly becoming more popular with the younger generation including also organised camping such as by the Scouts/Girl Guides and other similar social youth organisations.

# 2.3 Earmarking in Local Plans

For sites to become designated sites for recreational purposes, these required a planning process as required by the Development Planning Act (2016), through the partial Local Plan review. Further to this, Camping and Caravan Sites have been identified within a number of the approved local plans and subsidiary plans. These include the Central Malta Local Plan (2006), South Malta Local Plan (2006), the North West Local Plan (2006), the Gozo and Comino Local Plan (2006) as well as Marsaxlokk Bay Local Plan (1995). Whereas, the local plans so far have been actively utilised to determine where construction could take place, Government is now shifting its attention to the identified sites for camping, caravanning and picnicking with the intention of making more open air areas available for families for recreational purposes.

The South Malta Local Plan includes also the "Guidelines for caravan sites upgrading in Malta", (vide Appendix C). The North West Local Plan<sup>4</sup> also includes specific guidelines which provide direction beyond just planning considerations. In fact, these guidelines are geared towards proper site management and a satisfactory site design and operation. The intention for such guidelines was to partially address the ad-hoc and haphazard use of sites for caravanning.

The local plan policies relevant to this topic are briefly described in Table 1. This table indicates the localities already identified by the Local Plans for camping and caravanning.

<sup>4</sup> op.cit fn.1

Local Plan Area	Locality	Туре	Policy No/ Map
Central Malta Local Plan	Between Ghallis and Bahar ic-Caghaq, Naxxar	Camping and Caravan Site	NA 04 NAM 3
	Bahar ic-Caghaq	Reference to improving the existing area used for caravanning	NA 05
South Malta Local Plan	Zonqor/St Thomas Bay Marsascala/ Xghajra	Camping, Tourism related Touring Caravan Sites	SMTO 03
North West Local Plan	Draft Marfa Action Plan, Marfa, Mellieha	Caravan and Camping Sites	NWRE 2
Gozo and Comino Local Plan	Comino, Ghajnsielem Gozo	Camping Site	GZ-Ghjn-10
Marsaxlokk Bay Local Plan	II-Mara Birzebbuga	Camping Site after rehabilitation and restoration of site	MV05

Table 1: Caravan/Camping Sites in Local Plans

#### 2.3.1 Central Malta Local Plan

Policy **NA04** identifies an area for the allocation of a caravan site, between Ghallis and Bahar ic-Caghaq (vide Map **NAM 3**). This policy includes a number of conditions, which need to be adhered to by the prospective applicant. In addition to this policy, the subsequent policy **NA05** refers to the caravan site, specifying that "*Provision is also to be made for an emergency access passing along this landscaped buffer zone and linking the existing caravan site to the coast road".* 

#### 2.3.2 South Malta Local Plan

Policy **SMTO 03** specifically deals with "Camping and Touring Caravan sites". This policy identifies two general areas in Marsascala, one at Zonqor Point and another one at St. Thomas Bay. Moreover, it also lists a number of criteria which need to be adhered to by any prospective applicant. However, policy **SMMS 08**, specifies that the area is subject to an action plan to be prepared in order to provide the guidelines for the improvement of the overall area.

#### 2.3.3 North West Local Plan

Policy **NWRE 2** deals specifically with "*Touring Caravan and Camping Sites*". This policy specifies a number of criteria which need to be adhered to when it comes to the submission of a planning application for such sites in the area. Moreover, this policy refers to a site in the Marfa Action Plan, which has been identified for this purpose. This plan also identifies two camping sites, one of which has been implemented. However, it is important to note that the Marfa Action Plan was never

approved. In addition, policy **NWML 19** Anchor Bay calls for the investigation of a site for a caravan site.

# 2.3.4 Gozo and Comino Local Plan (Camping only)

Policy **GZ-Ghjn-10** Camping Sites on Comino deals specifically with camping activity on Comino. Camping is becoming relatively more popular on Comino and an area is designated for camping at il-Bajja ta' San Niklaw. However, since this is a sensitive area of ecological and scientific importance, care should be taken so as to avoid any negative impacts on the natural environment of this island. A detailed land use study of Comino would indicate a number of disturbed sites near the Hotel and Nautico complex. The policy calls for the immediate closure of the existing unofficial camping site at il-Bajja ta' Santa Marijia in favour of the use of the identified alternative site on Map 14.2-A 1.

# 2.3.5 Marsaxlokk Bay Local Plan (Camping only)

Policy MV05 had considered a camping site at II-Mara after the area was rehabilitated from dumping of coal ash.

# 2.4 Camping and Caravanning: Planning Permits and Environmental Management Tools

While potential sites for camping and caravanning have been identified, earmarked, and designated for these purposes, as per the Local Plans described above, to allow for the activities to be undertaken on site, a development planning application must be made for a full development permit in line with the procedures established in LN 162 of 2016. This process could involve environmental, social and transport assessment depending on the location, nature and scale of the projects.

Account is to be taken that the use of a site for camping and/or caravanning should always be temporary. This is especially important in view of limited land availability. Moreover, particularly public land may be required for future alternative use and as such this flexibility needs to be safeguarded. Furthermore, in relation to public land, it is in the national public interest that such land is allocated and used on a temporary basis.

# 2.4.1 Summary Schedule Permitting For Temporary Land Use

Camping and caravanning are to be proposed as temporary land uses. The Summary Schedule therefore applies. This implies that for camping and caravanning, permitting is allowed only on a temporary basis. Permitting is followed by the Planning Authority through the Summary Schedule Permit Type 6 under Legal Notice 162/16 'Procedures of Applications'. The policy for this type of permit is as follows:

## Type 6 Temporary use of land

- 1. The reversible use of land, by Government entities, Local Councils and other public entities appointed thereby, for the temporary placing and use of a caravan or a camp as well as any temporary structures required for such use during a period not exceeding four months within a twelve month period, not on scheduled property and provided that the land used is fully restored to its pristine condition and any structure is removed before the expiry of such period;
- 2. The use of land for the parking of vehicles within the Development Zone (DZ) not being heavy goods vehicles, trailers, buses and coaches, as well as site levelling and surfacing and any temporary structures required for such use where the footprint of such temporary structures does not exceed ten square metres and their height does not exceed three metres subject to prior clearance from Transport Malta for up to three years and not on scheduled property nor protected areas

# 2.4.2 Management Plans

Management plans are under the responsibility of the Environment Resources Authority (ERA). As recreational land uses, although temporary in nature, may also be close to environmentally sensitive areas, they could be guided further on how to be satisfactorily integrated within the surroundings through Management Plans, where applicable. The SPED 2015 as a national, intergovernmental strategic document calls for the preparation of management or action plans with priority for nature conservation under Rural Objective Policy RO 5.3.

## 3 Picnicking

#### 3.1 Land Use Considerations

The SPED 2015 protects the right to the enjoyment of open, natural and undeveloped space by the general public. This is in effect the main principle emerging from the SPED in its guidance on recreation. It emphasizes prioritising informal rather than formalised recreation. This implies that open space recreation is fully supported through current strategic policy subject to conditions followed in the interest of integrating the SPED's recreation policies with the protection afforded also to agriculture, the environment and cultural heritage within the rural or coastal areas.

Picnicking is a form of popular recreation where a temporary change in setting from the dense built up area to the openness of the rural countryside is pursued. This is a very legitimate form of recreation, quite safe and not causing any nuisance if followed in an organised manner. This use is also important for the continued well-being, healthy lifestyle and retention of a good quality of life for the public.

Picnicking areas or publicly available open spaces have been identified in existing Local Plans, such as the 11 picnic sites in Policy NWRE 07 of the 2006 North West Local Plan. Moreover, this type of recreation is mostly temporary, involving short stop activity that is carried out mainly during the daytime and does not therefore involve overnight stays. Most people in effect return home after a daily picnic. It is important to note that to undertake the activities of picnicking no planning permit is required. It is surmised that this should remain so, in the interest of practicality.

It is assumed that the negative impacts of picnicking on designated sites are limited, on the premise that the activity is carried out in an orderly manner with minimal waste generation, noise or damage. However, this is not always the case since if carried out in conjunction with contravening behaviour, such activities may still cause significant negative impacts on the surrounding rural and coastal natural environment. Education is used to limit negative impacts.

Picnicking may be followed relatively car free, using public transport or parking areas, then venturing on foot, as well as ensuring compatibility between recreational activities and between these activities and other land uses in line with Rural Objective Policy RO 2.5.

SPED 2015 policy exists also for the Island of Gozo whereby Gozo Objective Policy GO 1.11 requires the establishment of family friendly recreational parks. These policies for Malta and Gozo are approved but require further implementation efforts that could easily provide for the picnicking requirements of the public.

# 3.2 Sites earmarked in Local Plans

Picnicking Sites have been identified within most of the approved local plans and subsidiary plans. These include mainly the Central Malta Local Plan (2006), South Malta Local Plan (2006), the North West Local Plan (2006) as well as the Gozo and Comino Local Plan (2006).

Local Area	Plan	Locality	Туре	Policy No/ Map
Central Local Plan	Malta	Victoria Lines and Mosta Valley Route, Mosta		CG 26 MO 07
		Coastal Walkway Route Bahar ic- Caghaq, Naxxar	Picnics	CG26 NA 04
		District Level Recreational Area Mosta	Picnics	MO 08
South Local Plan	Malta	8 sites within Marsacala, Ghaxaq, Siggiewi, Zurrieq, Xghajra, Zabbar, Sta Lucija, Gudja and Mqabba	Picnics	SMRE 02
		National parks at Marsascala and Xghajra	Picnics	SMIA 13
		District park along the Cottonera Lines	Picnics	SMIA 12
North West Plan	Local	Country Parkways along 5 routes at Victoria and Dwejra Lines, Ta' Qali National Recreational Centre, Chadwick Lakes, Mtahleb, Fomm ir-Rih, Buskett and		NWRE 5 NWRE 8
		Wied iz-Zurrieq Ghar Lapsi Siggiewi.	Picnicking Site	
		Anchor Bay Mellieha	Picnicking Site Recreation	
		Mtarfa	Picnicking Site Recreation	NWML 19
		II-Buskett Action Plan		NWMT 10
				MWBU 1

Gozo and Comino Local Plan	Circular Walkways and Cycle Ways	GZ-RECR- 1, GZ- RECR-3, GZ-TRAN- 6
Marsaxlokk Bay Local Plan	Recreational Footpath System Coastal Footpath	MA03 ML02
North Harbours Local Plan	Walking and Cycling	NHRL 06

**Table 2: Picnicking Sites in Local Plans** 

#### 3.2.1 Central Malta Local Plan

Policy **CG26** of the CMLP (2006) identifies a number of trails for walking that can also serve as suitable stops for informal picnicking, i.e. with minimal requirement for supporting facilities. The Trails are aimed at enhancing: the appreciation of cultural historical heritage such as the Victoria Lines in Mosta; natural heritage such as the Mosta Valley system, which includes six interconnected valleys; and the Naxxar Coast. Policy **MO 07** details the Victoria Lines Route and Mosta Valley Route in more detail as per Map MOM 3.

#### 3.2.2 South Malta Local Plan

Policy **SMRE 02** suggests 8 walking routes along different areas within the localities of Marsacala, Ghaxaq, Siggiewi, Zurrieq, Xghajra, Zabbar, Sta Lucija, Gudja and Mqabba. These routes are identified for informal recreation including walking, cycling and also picnicking. The policy calls for improvements to make these walking trails more appealing and usable including the introduction of such facilities as may be required to effectively promote these activities. Other policies include Policy **SMIA 12** for a District Level Park along the Cottonera Lines, parts of which have recently been upgraded. This is becoming very popular with the communities of both Fgura and Zabbar. Policy **SMIA 13** designates National Parks at Marsascala and Xghajra *i.a.* for picnicking. This refers to a coastal route that incorporates a number of heritage features of interest.

#### 3.2.3 North West Local Plan

Policy **NWRE 05** suggests a number of country pathways suitable for outdoor recreation along five routes namely at the Victoria and Dwejra Lines, Ta' Qali National Recreational Centre, Chadwick Lakes, Mtahleb, Fomm ir-Rih, Buskett, Wied iz-Zurrieq and Ghar Lapsi in Siggiewi. Policy **NWRE 8** details the Victoria and Dwejra Lines route in further detail. The route is intended to join the CMLP heritage trails. The outdoor recreation in these policies is intended to cover a wide array of activities including walking, hiking, jogging, orienteering, school outings for educational purposes, horse riding, archaeological and historic specialist groups visits and picnicking. A number of NWLP (2006) policies also refer to picnicking activity

including policies **MWML 19** Anchor Bay, **NWML 10** Mtarfa and **NWBU 1** Buskett Action Plan, which traditionally is a very popular picnic site.

#### 3.2.4 Gozo and Comino Local Plan

Policy **GZ-RECR-1** encourages informal rural recreation. Policy **GZ-RECR-3** designates Circular Walkways for walking, cycling and horse-riding activities. Furthermore, Policy **GZ-TRAN-6** promotes the introduction of a network of cycle ways. Although not mentioned in the above policies, it is understood that alongside walking, picnicking activity normally is also possible.

# 4 Food for Thought:

## 4.1 District Level Regional and Urban Parks

Account needs to be taken of the substantial number of zoned and identified urban parks that remain little used within the urbanised areas or in their immediate vicinity, which are to date not being utilised in fulfilment of their established and intended use. Although zoned for such use by the Local Plans and other subsidiary plans which are currently in place much work is still needed to continue to promote that these sites be used and appreciated by a greater number of people.

An example of one such district level park that has recently been successfully upgraded and which is already seeing increased visitation numbers is the District Level Regional Park between Fgura, Bormla and Zabbar (refer to the aerial photo below) along the outer Cottonera fortifications. This park was identified within the South Malta Local Plan in 2006 but it was only recently that it got the much-needed upgrading so as to be enjoyed by the communities in this region. This is a clear example of how urban parks and green open spaces can be made available close to the localities themselves, in this case with three different but adjacent localities of Fgura, Bormla and Zabbar. Incidentally, one of the characteristics common to all three localities is the high density and the associated problems such as traffic. As such urban parks such as this one, assume a much greater relevance in such an urban context.



The use of urban parks aligns with the SPED Urban Objective UO 3.8 which seeks to retain and upgrade public open spaces in urban areas. Elements of picnicking, and possibly seasonal light tent camping, if well managed could be integrated within these urban parks.

Indeed, greater use of such parks may imply the need for further upgrading and investment and also the adoption of a management structure which will ensure that the park is well maintained and operated in the best possible manner so as to guarantee the best possible experience to its users.

The added advantage of the greater use of urban parks is that these are regional and as such do not require long distance transport to be reached. In fact, these can be reached by the pedestrian within the region itself or through a very short car visit if parking is organised adjacent to the parks.

Transport wise greater use of urban parks can double off as a sustainable recreational option with less need for travel, fuel consumption, time in traffic and can be considered nationally as an additional viable climate change mitigation action. Such strategic considerations guided by the SPED, especially those related to the approved and existing sites in subsidiary plans, have a strong bearing on any way forward regarding this topic.

# 4.2 Factors affecting Camping, Caravan and Picnicking Sites

Camping, caravan and picnicking sites are subject to a number of issues that need to be discussed further and seriously assessed in detail at more advanced stages of recreation facility provision. This implies the consideration of a number of factors that need to be investigated to make such recreational land uses acceptable in principle and successfully implementable. Such considerations include amongst others:

#### **Operational Factors**

- Feasibility;
- Time of stay to allow for continued turnover in respect of the 'temporary use' principle;
- Efficient and effective site management;

# Planning, Environmental and Transport Factors

- Environmental tolerance and limiting negative impacts to surroundings;
- Avoiding dense agglomeration through overuse of a site and locating sites sparsely for increased and distributed provision;
- Addressing characteristic differences between camping, caravanning and picnicking areas;
- Transport, safety and access considerations; and

#### <u>Cultural Factors</u>

Education and back to nature lifestyle promotion

#### 4.2.1 Feasibility

Past indications related to applications for camping and caravan sites, have shown that where use for these recreational activities experienced feasibility issues, this resulted in requests for further 'ancillary' permanent uses normally associated with urban areas. Such unjustified requests outside the development zone quickly turn the original project from an initially considered acceptable and reasonable land use, into a use that is unacceptable within the countryside due to its negative impact such as noise and traffic generation and visual intrusion. Such instances eventually lead to

the urbanisation of our rural areas and would eventually defeat the whole purpose of providing such land use for recreational enjoyment in the first instance.

In order to avoid unfeasible projects, business plans are required so as to ensure that such proposals can actually be implemented without the need of other unacceptable uses such as restaurants and other disproportionate commercial uses, which are not in line with the temporary nature of such uses and which lead to the urbanisation of our countryside.

# 4.2.2 Time of Stay

The time of stay issue applies mostly to camping and caravanning. As with the current situation, issues will arise whereby campers/caravaners tend to retain space for very long periods with relatively little or no turnover of spaces. This is usually done at the detriment of the general public and other third-party users with similar rights to use such spaces. This unfair and unjust trend may be resolved through the creation of well-managed, authorised sites, where the time of stay is controlled.

## 4.2.3 Site Management

Caravan and camping sites require management in order to allow for a proper following of standards of operation which include: site administration; health and safety; operational day to day management; adequate distancing between caravans and camps; services provision including utilities such as water and electricity provision; waste management; the provision of day to day essentials such as groceries and other factors that may arise in the daily operation of such sites.

Unmanaged sites lead to multiple issues such as general nuisance, noise, waste generation, possible pollution and damage to immediate environmental surroundings due to site overspill. These impacts are not acceptable and such an unmanaged land use is neither encouraged nor permitted.

Site management is a basic essential for several reasons. The first being to avoid overcrowding so that users will be able to have a pleasant experience. Secondly, a well-managed site will ensure a proper turn over guaranteeing that the site is available for use by a greater number of people, where the users can book their stay and plan their holiday beforehand possibly even hiring the caravans themselves rather than purchasing/utilising their own, with related issues of storage and parking when not in use. Thirdly, the control of users is paramount so as to prevent overspill and to protect the surrounding natural environment. The setting of a limit on each site is a necessity and needs to be strictly followed otherwise overuse will conflict immediately with the surroundings and general environment of the area.<sup>5</sup> This is normally implemented through the site layout and design, with demarcated numbered

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<sup>&</sup>lt;sup>5</sup>A quick review of similar foreign sites will immediately indicate that these sites are advertised together with the permissible number of units within the site. This is strictly adhered to and persons are serviced through site turnover.

or lettered slots for ease of identification and use by individual caravan/camp units. For example, slots can also be released and managed through parking barriers after registration, but again this would require daily management of the site.

If a site is well planned, it may also serve as an additional amenity geared towards a specific type of adventurous tourist offering. To date, given the current situation where managed sites are almost nonexistent, this demand is still limited. However, it may grow if adequately supported, developed and marketed. A managed, high quality site would cater for this niche tourism offering. It could also assist the tourism economy with a wider product aimed at increased activity in the shoulder months. Abroad this service is largely dependent on exceptionally high-quality sites, or a few scattered spaces in key vista areas alongside belvederes, where caravan owners may stop temporarily for a few nights after booking with local authorities or service providers.

The activities of camping and caravanning in themselves should not harm the natural setting and environment of the surroundings of the site, as this would defeat the whole purpose of spending time in that location in the first place. This is one of the main reasons why possible future sites, the location of which is already earmarked, need to be supported by a proper management structure. A badly managed site would inevitably damage the surrounding area and introduce nuisance.

#### 4.2.4 Environmental Tolerance of Sites

The Maltese environment faces many challenges and has a limit as to how much activity can be tolerated in any specific area. Any land use that involves human activity of some sort will inevitably impact the surrounding environment to some extent. Although an ecological approach without human interference would have its idealistic advantages, one cannot and should not simply exclude the human element completely from its surrounding nature. The objective should be for humans to live suitably with and within nature. There is therefore a certain level of tolerance where balance needs to be applied. This implies that environmental protected and scheduled areas and areas of sensitivity need to continue to be as far as is possible protected and safeguarded from particularly land intensive recreational activities.

These areas encompass all the safeguarded areas including SACs, SPAs and MPAs as per SPED Thematic Objective Policy TO 8.2. It is not recommended to place unnecessary additional pressures on an already fragile national environment especially through the increase in competing activities and unsustainable patterns of activity in such areas.

Human activity, both during the day and during the night, even for recreation, may conflict with specific areas (such as cliff edges and certain protected parts of the coast and valleys), which include protected fauna such as birds. In this case for example, activity related to camping and caravanning prolongs also into the night. This introduces human noise and light pollution that are alien to such protected areas. As

such the particular characteristics of these recreational land uses need to be taken into serious consideration, as the natural environment in such cases would be affected over a 24-hour period. Unfortunately, this would also significantly reduce and deteriorate the quality status of local biodiversity.

Protecting the environment according to the SPED Thematic Objective Policy TO 6.1 implies controlling the location, design and operation of development. This applies also to formal recreational projects.

Another area of concern is the protection of our cultural landscape and the impact of such sites on areas of landscape sensitivity, especially caravan sites which are more conspicuous and visible and if not organised and adequately landscaped, can simply transform into an additional eyesore in our countryside.

However, less sensitive and therefore environmentally tolerable areas can be earmarked especially in those locations with a certain degree of human activity and/or brownfield sites. Such locations would be ideal sites for recreational uses such as camping and caravanning. Moreover, through planned management, of these sites, the adoption of mitigation measures, and also through the education and guidance of the respective users, the impacts on the surrounding environment will be limited to a bare minimum.

In contrast and in line with the discussion in the preceding subsection on the importance of good management of such sites, a lack of investment or generally poor standards of site design and lack of ongoing site upkeep and administration would further exacerbate such impacts on the environment. Furthermore, wherever there is human activity this usually leads to waste generation that needs to be managed especially in such rural recreation areas, where the resultant impacts can be significant. With respect to camping and caravanning, the overall benefit of having specific well managed sites is that these can be much better controlled and monitored than the ad-hoc unplanned locations we have today.

In conclusion, the proper siting and consideration of such sites needs to fit into the overall environmental strategy based on the protection and stewardship of our environmental assets as a priority. This implies that any such projects would require SEA Screening considerations and consultations with the ERA.

## 4.2.5 Camping and Caravanning: Impact Differences

Although camping, caravanning and picnicking are considered together in this Discussion Paper, these are essentially different types of recreational land use and their characteristics and impacts are not the same. This section looks into some of these differences.

Camping consisting of small tent pitch type camps has a lesser impact and can easily fit into a rural space and into the natural surrounding rural environment than caravanning. Caravanning takes up much more physical space and includes more demanding mobility requirements related to the transportation and manoeuvre of such caravan units. Vehicular transport takes up more space and pollutes the surroundings in terms of noise and fumes. Small tent camping can be portable and carried along by a rambler, trekker or hiker without the need of involving vehicular transport.

In effect, caravan sites need to allow for more space than for the caravan itself since these involve substantial additional space requirements for the parking of vehicles. If this is not planned properly it may result in overspill around the caravan site. Caravans also require substantial more space within the site itself for the safe manoeuvrability, including turning spaces to avoid reversing. Reversing with caravans can be dangerous and limits the safety of the caravan sites, which are normally used by families with younger children. This would place more responsibility on not just the users of such sites, but also the management who need to ensure safety within the site itself.

Therefore, in terms of land use there is a great difference between the land available for a tent pitch, touring caravan pitch or for example the much larger campervan/motorhome pitch, which are much larger caravans taking practically twice the size of a normal caravan in terms of both road space and camper slot space. Such differences would need to be factored into any well-planned system and should also be reflected in the pricing and charging system.

Another difference is that camping may be enjoyed without the need of electricity/water provision on site for the individual tents. Caravans on the other hand normally require on site electricity and water provision within the caravan site for each caravan. The issue of additional formalisation of sites with services is of concern since apart from the impact of the site itself there is also the added environmental impact and related to the introduction of such services provision into natural areas.

Another difference is related to visual intrusion into the cultural landscape both rural and coastal. Whereas camping sites can be fitted into the surroundings through proper greening of the site's boundaries, caravanning tends to be more noticeable and in conflict with particular lines which characterise our rural landscape. Such an impact is more significant especially with larger caravans. Therefore, greater

attention is required in respect of environmental and visual aspects when it comes to the setting and design considerations for caravan sites.

Another major impact associated with camping and caravanning is that of light pollution. However, such an impact is more associated with caravan sites rather than camping sites. On the other hand, picnicking may be less impacting, since these activities are normally traditionally followed during the day. Picnicking may also be enjoyed without generating additional car use, although in the local context picnics are normally still attended by families through car use. The availability and facilitated access to such activities, coupled with a change to a more active lifestyle, could eventually induce a change to past habits.

## 4.2.6 Transport and Access

Camping and caravanning is also associated with transport related impacts. Depending on the scale of such sites and number of users, such projects may require a Transport Impact Statement (TIS) which is necessitated especially for larger sites with substantial turnover. This is important so as to address safety and other transport matters such as access, impact on roads, and nearby junctions, parking/manoeuvring requirements as well as the resultant issues of access through country paths within our countryside.

As already discussed, this impact is mostly related with caravanning. Caravanning is considered an intensive transport use generator within the countryside and along coastal areas. Most rural and coastal areas in Malta and Gozo, still in their natural state, do not have adequate access roads or parking and manoeuvring spaces that can cater for high demand. Moreover, high demand could very well alter the natural setting of these areas, eventually turning them into semi-urbanised settings. Such a major change to our countryside and natural coastal areas requires careful consideration.

On the other hand, picnicking in designated areas may be followed with minimal changes to the natural setting, fitting into the environment without much alteration. In this regard, pedestrian access to designated sites/areas remains the more environmentally sustainable option.

# 4.2.7 Education and Back to Nature Lifestyle

Education is crucial to rekindle human understanding and respect of nature. This is important both from a health perspective as well as an educational one. Mankind through urbanisation has become detached from the natural environment. Over the years this problem has also been compounded with the loss of urban green open space, previously provided through housing design schemes, with urban gardens many of which have unfortunately fallen victim to an increasing development appetite.

Furthermore, over time, the widespread use of cars has increasingly taken over many urban open spaces and previously undeveloped spaces, for roads and parking.

These urban changes alter not only our surrounding environment but also our cultural understanding and appreciation. This places an onus on decision makers to educate the public to understand and respect Nature, reintegrating into the overarching ecosystem - working with Nature instead of against it. Recreation consequently, if followed through a well thought out change strategy, and not based on the immediate satisfaction of unsustainable demands, can lead to a new found consciousness of how humans relate and treat their habitat.

A point for further discussion is the introduction of controlled and monitored picnicking and low impact, short stay (one night), camping in specifically identified spaces (e.g. away from National Parks' most sensitive areas). These could be incorporated within educational recreation and tourist leisure programmes whereby the highly urbanised local population could be brought into the natural setting for brief periods, to experience directly the beauty and importance of these Nature Park areas. This could be especially important for extra-curricular school activities and nature-loving tourists who visit the Islands.

Unfortunately, past trends have focused on a restrictive precautionary stance that somehow discourages public access to National Parks. Still, these are very large sites and the public should be educated to make proper use of them. This is more conducive to the learning process and cultural enhancement than an isolationist approach to the environment. Such a measure is in line with the SPED Thematic Objective Policy TO 8.5 setting out a policy framework for culture-led regeneration programmes and projects.

The public cannot successfully appreciate natural assets if it remains detached within an urbanised context. A return to nature appreciation through active recreation via a well organised programme of recreational activity opportunities, could go a long way in increasing public awareness and education on the importance of fauna and flora. This is particularly relevant to recreation based on picnicking in the countryside.

#### 5 Conclusion

This Paper has sought to outline the current policy framework for recreational land uses for camping, caravanning and picnicking. Sites already designated in the Local Plans have been highlighted with the intent to instigate debate on the implementation and development of these sites for the aforementioned purposes. Food for thought has been provided on considerations for possible ways forward in this respect.

Given that most of these sites are situated on public land, implementation may be foreseen by either Government; Local Councils; any Government entity; public-private partnership; or the private sector. Camping and caravan sites are envisaged to be well organised, managed and operated according to established standards. Proposed projects on designated land are subject to a development planning application, which should be in line with the provisions established in the respective Local Plan Policy as well as any other policies and regulations by other Government entities such as ERA and Transport Malta (TM). Such applications may still require EIA and TIS pre-screening depending on the details and scale of the projects. The unauthorised use of any other non-designated sites should not be acceptable, and any such use should be prohibited.

Picnicking follows the SPED National Parks and Local Plan district level and urban park designations, and the heritage and walking trail (including cycleways, bastion trails, coastal footpaths etc) locations identified within subsidiary plans. Considerations dwelled upon *i.a.* relate to - upgrading and promoting district level and urban parks as has been done for example with the Cottonera Lines District Level Park; further promoting positive changes towards a healthy lifestyle not just through education and awareness campaigns but also through the promotion of a greater use of urban pedestrian friendly parks and open space provision; and improving and maintaining these sites for the long term.

The Government is therefore inviting the general public to make submissions that include:

- 1. Views and reactions to this Discussion Paper including options for a way forward, particularly to inform of the type of facilities required for possible inclusion on already designated sites for camping, caravanning and picnicking, as well as how management of these sites may be foreseen.
- 2. Opinions on the existing 'Guidance for Caravan Sites Upgrading' as approved and included within the local plans (vide. Appendix C).
- 3. Expressions of interest by land owners of areas/sites earmarked in Local Plans for the purposes of the aforementioned recreational activities, to have

such land rehabilitated accordingly, delineating the role they may envisage playing in the management of their site for these purposes.

Any innovative ideas, recommendations, views, opinions, suggestions or proposals received by the Government further to this Discussion Paper will need to be evaluated, and if deemed acceptable, will be taken into consideration in the eventual way forward which may be adopted by the Government on this topic.

# Appendix A: Local Plan Policies for Camping, Caravanning and Picnicking Areas

## Central Malta Local Plan (2006) Policies

# **Camping and Caravanning Policies**

- NA04 Protection of the Natural Coastal Area

MEPA will not permit urban development along the open coastal area of Naxxar, between Ghallis and Bahar ic-Caghaq, as designated in the Naxxar Coastal Policy Map. All efforts will be made in order to retain or reinstate these designated areas in their natural state.

MEPA will however consider minor development including essential coastal pedestrian/cycle access improvements along a planned Coastal Walkway Route in line with Policy CG26 subject to and following the submission of a comprehensive Environmental Management Plan (EMP) for the area in accordance with Policy CG27. MEPA will also consider the feasibility of allocating a managed caravan site within the search area as indicatively shown on Map NAM 3.

Developments allowed by this Policy will be subject to the following criteria that:

- a. They will not cause a negative impact on any protected environmentally sensitive areas identified on the Naxxar Coastal and Rural Environmental Constraints Map and in accordance with the provisions of Policy CG22;
- b. Any developments, including any minor works, will be assessed against all environmental considerations identified in the relevant EMP for the area;
- c. They will not visually dominate or disrupt the natural coastal setting and landscape because of layout, design, style and materials used, and they will not introduce any extraneous forms, materials, textures or colours. In this respect, the introduction of cemented passages/areas on the natural rocky coast is not permitted;
- d. They will not adversely affect sites of coastal archaeological/historical importance;
- e. All parking areas will have suitable safe access/egress facilities so as to eliminate inappropriate parking and safety hazards on the arterial coast road; and,
- f. They are subject to the approval of other related agencies wherever necessary.
- 12.1.12 The coastal area of Naxxar is of high ecological, scientific and scenic importance and is identified in the Coastal Strategy Paper as a predominantly undeveloped and natural rural coastline. It is also an interesting landscape that offers a typical visual perspective of the Mediterranean coast. The main aim of the policy is to conserve and safeguard the natural and cultural value of the protected coastal areas. The tourism sector is increasingly acknowledging the benefits of retaining and protecting the natural coastline, which portrays the beauty of the Mediterranean coastal setting and landscape in its original state as a tourist product in its own right. In this case, this part of the coast is of strategic importance since it is the only remaining open coastal gap between the heavily urbanised areas of Pembroke and Qawra. An open coastline also allows for informal leisure activities, including enjoyment of the maritime landscape. Therefore only minimal development related to public access improvements, a possible caravan site and

landscaping works will be allowed in this coastal stretch, excluding any form of urban development.

12.1.13 The policy follows the Coastal Strategy Paper of the Structure Plan review which seeks to address national issues relating to the coast, including the need to control the degradation of terrestrial and marine habitats from intrusive developments, and the competition for space by other uses which have established themselves over time, including the existing caravan site at Bahar ic-Caghaq that lacks essential management. In line with these strategic objectives, the local plan aims to concentrate additional recreational developments in the already popular recreational area of Bahar ic-Caghaq whilst conserving the pristine coastal area as an important strategic buffer zone between existing developed areas. In addition Ghallis Rocks are protected as sites of specific scientific importance (Structure Plan Policy RCO34). The scheduled area of ecological importance at I-Ghadira s-Safra constitutes a Natura 2000 Special Area of Conservation Site of International Importance. Another scheduled area includes the Saline Marshland limits of Qalet Marku.

## NA05 Improvements at Bahar ic-Caghaq

MEPA will support further recreational development proposals and access improvements in the Bahar ic-Caghaq area in accordance with the designations indicated in the Bahar ic-Caghaq Area Policy Map and the provisions listed below:

- i. In the area designated for recreational activities, only outdoor recreational activities will be permitted in accordance with Class 9 (d) (Use Classes Order, 1994). Attention will be given to the proper layout, design and appearance of these uses with particular emphasis on the heavy landscaping of the entire designated area. A landscaped buffer zone is to be provided between this designated area and the residential area to the south. Provision is also to be made for an emergency access passing along this landscaped buffer zone and linking the existing caravan site to the coast road to the satisfaction of MEPA and the ADT;
- ii. In the designated boat storage area, only uses covered by Class 19 (a) (Use Classes Order, 1994) will be permitted. This development is permitted provided that buildings are not to exceed the height of 1 floor. MEPA supports the general upgrading of this area through adequate landscaping improvements;
- iii. Along part of the foreshore reserved for marine sports coastal access improvements, only development proposals limited to such uses including jetties, slipways, quays, hard standings and moorings will be permitted. All maritime related access developments are subject to prior approval by the Malta Maritime Authority, and may require an Environmental Impact Assessment depending on the nature and scale of the development proposed;
- iv. At Triq ir-Ridott a new parking area with peripheral soft landscaping and with suitable and safe pedestrian links to the coast is to be provided as indicated on the Bahar ic-Caghaq Area Policy Map; and,
- v. The provision of general landscaping, including public paved walkways and hard and soft landscaping, will be supported by MEPA. Landscaping works are not permitted within the protected coastal area in accordance with Policy NA04.
- 12.1.14 The coastal area at Bahar ic-Caghaq is a popular recreational area with the local public and tourists. The Local Plan strategy is to focus further maritime related recreational development at the coastal area of Bahar ic-Caghaq as shown on the Bahar ic-Caghaq

Area Policy Map. The rest of the coast is to be conserved in its natural state in line with Policy NA04. However, the recreational area of Bahar ic-Caghaq is to be further developed and upgraded with suitable and compatible developments.

- 12.1.15 In order to satisfactorily protect the residential amenity of the Bahar ic-Caghaq settlement, recreational and maritime sports areas as well as other permitted facilities are zoned separately from the residential areas.
- 12.1.16 The early development into residences of the existing derelict building at Triq ir-Ridott is encouraged by MEPA in line with the above mentioned objective to protect and keep separate the residential component of Bahar ic-Caghaq from other activities.
- 12.1.17 The existing caravan site at Bahar ic-Caghaq lacks site management and basic elements of caravan site planning covering layout, safety, health requirements and landscaping needs. Proper management initiatives are therefore required. So as to effectively screen caravans from public view, landscaping and design criteria are a fundamental requirement for any upgrading of this area. Access to the designated site should be well planned so as to allow for the safe movement of cars, pedestrians and emergency vehicles.

# **Rambling and Picnicking Policies**

- CG26 Promotion of Heritage Trails and Walkway Routes

MEPA in conjunction with other relevant agencies will promote the introduction of a Heritage Trail along the Victoria Lines, a new walkway route along the Mosta Valley System and a Coastal Walkway Route in Naxxar. These walkway routes are indicatively shown in the Mosta, Naxxar and Gharghur Area Policy Maps.

In conformity with the provisions of Policy CG27, Environment Management Plans are to be formulated and approved for the designated Heritage Trails and Walkway Routes, and all works are to follow the guidance and recommendations set out in these EMPs. MEPA will promote improved pedestrian access along these routes through the upgrading of existing pathways and urban links, and through the creation of new access links where these are necessary and cause acceptable environmental impacts. MEPA will ensure that public access along these routes, and important local and panoramic views from these routes will not be compromised by any development in their vicinity. Where appropriate, these routes will incorporate tree planting schemes and picnic areas.

- 3.7.8 The Victoria Lines (1870-1899) consist of a military line of fortifications built by the British, dividing Malta from west to east and intended to protect the harbour area from possible land invasion. The fortifications comprise a unique network of defences that includes forts, batteries, magazines, entrenchments, bridges and barracks linked by a continuous wall used by infantry. These Lines have been scheduled by MEPA as a Grade 1 monument. Furthermore the Lines are located in an area that has been scheduled as an area of high landscape sensitivity. This scheduling has integrated the value of the monument as a cultural asset with that of the Great Fault as a natural asset.
- 3.7.9 Apart from the Victoria Lines, a valley and coastal walkway route are planned along the Wied il-Ghasel valley system and the Naxxar coastal area respectively. There are a

number of attractions that entice tourists and locals to visit these areas. These include sites of archaeological and historical importance, a number of chapels and the Gnien ta` L-Gharusa public garden. Given this context, these areas are ideal locations for such projects. The routes are extensive enough to allow for the planning of inter-locality, district level walkways. In conjunction with the planned Mosta heritage trail, an interpretation centre with feature signage, a site for outdoor informal recreation (refer to Policy MO08) and picnic areas are also planned to further attract the public and tourists to this area.

3.7.10 It has been noted from site surveys carried out that certain areas are currently accessible with difficulty, and only minor access improvement works are required to improve public access along these routes. Existing natural footpaths with limited interventions, including paving and signage, should be used where possible. All minor works must follow the guidance and recommendations of the EMPs to be formulated for these areas.

## - CG27 Environment Management Plans

MEPA will support the early formulation of Environmental Management Plans (EMPs) to be drafted in consultation with the Department of Agriculture, the Works Division, Local Councils, NGO's and other relevant agencies for the following areas;

Location	Relevant Policies	Area Policy Map
Victoria Lines Heritage Trail, Mosta Valley Walkway Route and District Level Recreational Area	MO07, 08	момз
2. Coastal Walkway Route	NA04	NAM3

MEPA will only consider proposals for recreation related developments in the areas listed above following, and subject to, the recommendations of the relevant EMPs. MEPA reserves the right to require other EMPs, apart from those identified in the above mentioned priority list, if it deems the need for their preparation in respect of other proposals.

#### In general the EMPs will be required to:

- i. Resolve existing conflicts between land users in the rural areas through conflict resolution mechanisms and mediation processes;
- ii. Produce detailed management plans with site-specific proposals for the rehabilitation of abandoned and degraded agricultural areas, habitats and landscapes whilst defining allowable uses. These management plans are to include a detailed statement for any habitat engineering works;
- iii. Provide for the conservation of areas of environmental value, and to promote the educational use of important habitats where appropriate;
- iv. Introduce where appropriate public access and informal recreational activities in the countryside; and,
- vi. Initiate the implementation of rural rehabilitation programmes through site specific agreements with involved key players. EMPs shall be implemented under the supervision of qualified persons to the satisfaction of MEPA and other relevant agencies.
- 3.7.11 Experience has shown that within rural areas although sites are designated for their environmental importance, proper management of these areas is either a long-term process or in cases never takes off. In addition, the Local Plan document is not site

specific and detailed enough to initiate environmental management schemes for rural rehabilitation. This policy however sets out the framework for the early formulation of EMPs aimed to achieve the rehabilitation and upgrading of two priority areas. These EMPs are required to be prepared by MEPA similar in format to Action Plans/Development Briefs. The need for EMPs also follows the provisions of Structure Plan Policy RCO6 that requires the introduction of rural management initiatives. These EMPs would therefore serve as a management tool for future rural rehabilitation.

3.7.12 In the recreational and heritage appreciation projects indicated in the policy, the Plan follows the advice of the Environmental Resource Surveys that were carried out during the initial stages of the preparation of the Local Plan. The need for these EMPs has stemmed from the recommendations included in these survey reports that point out to the need for the proper management of these areas that are valuable from many environmental aspects.

# - MO07 Victoria Lines Heritage Trails

MEPA in conjunction with other relevant agencies, including the Mosta Local Council and the Malta Tourism Authority, will promote the upgrading of the public routes along the Victoria Lines to form a Heritage Trail, and will introduce a Valley Walkway Route along the Mosta valley system. These two routes will link at the outer boundary of Fort Mosta thus forming one formal major heritage and nature trail. The two routes are planned along key historical and natural attractions as identified in the Mosta Recreation Area Policy Map, and will be planned in conjunction with the District Level Recreational Area in accordance with Policy MO08.

Subject to the provisions of Policies CG26 and CG27, only the following developments will be considered by MEPA in the precincts of this formal major trail:-

- i. Acceptable access improvements planned along the routes which, as far as possible, make use of existing and natural pathways and urban links;
- ii. Tree planting schemes, informal open recreational areas and picnic areas only where appropriate; and
- iii. The District Recreational Level Area to be developed in line with Policy MO 08.

These developments are to comply with the provisions of an Environmental Management Plan (EMP) to be formulated for the entire designated area in accordance with Policy GC 27 before any developments take place.

11.1.21 Mosta has a rich heritage consisting of natural and historic attractions. These include the Mosta Dome, numerous chapels bordering the valley areas and other sites of archaeological, historical and natural interest. The Archaeological Survey has in fact recommended the Victoria Lines as being an ideal location for the establishment of a Heritage Trail. A valley walkway route is also planned to pass along the four valleys of Wied ta' L-Isperanza, Wied Gjananu, Wied is-Sir and Wied il-Ghasel. The designated sites for outdoor recreation and for the interpretation centre, as indicated in Policy MO08, are planned in conjunction with these major heritage and nature trails thereby creating an overall project attractive enough to entice both locals and tourists, and consequently making heritage upgrading feasible. The trail and valley walkway routes in all provide for approximately a 6-hour recreational walk. The whole route is about 5,000 m in length, with the Victoria Lines route being 1,800 m long and the valley walkway route being 3,200 m long. A number of urban links for shorter walks with the Mosta residential areas are also identified in the Mosta Recreation Area Policy Map.

- 11.1.22 Parts of the Victoria Lines route upgrading have already been implemented by the Mosta Local Council and access improvements are required to join this planned trail to the Valley Walkway Route around the outer walls of Fort Mosta. It has been noted from site surveys that certain areas are currently accessible with difficulty and only minor works, including steps and improved footpaths, are required to improve public access along the routes. All such minor works are to abide by the guidance and conditions set out in the EMP for the area.
- 11.1.23 Wherever possible the formation of cycle routes is also promoted along the Victoria Lines as such recreational activity would further enhance the attraction of the locality. Cycling is healthy, low-cost, non-polluting and very popular with tourists as it allows for physical exercise whilst enjoying the landscape, countryside or coast. It is also popular with children but very limited provision exists at present. MEPA will therefore positively support the introduction of a cycling circuit in conjunction with the proposed District Level Recreational Area.
- 11.1.24 Fort Mosta itself is presently inaccessible since it is an Armed Forces of Malta site. The local plan however recognises that the Fort is a major heritage site that is currently inappropriately utilised. The Plan therefore recommends that the Fort should eventually be used as a primary tourist and local attraction rather then a storage area as at present. In this respect, the route is only temporarily planned to follow pathways around the outer limits of the Fort, but should also eventually incorporate Fort Mosta itself once a more suitable alternative site presents itself for the current AFM storage facilities.

#### MO08 District Level Recreational Area

The land at Tal-Qares and Misrah Ghonoq as indicated in the Mosta Area Policy Map and the Mosta Recreation Area Policy Map is designated by MEPA as a District Level Recreational Area. This area shall be planned comprehensively together with the Heritage Trail along the Victoria Lines as per Policy MO07 and in accordance with the provisions of an Environmental Management Plan (EMP) for the area to be formulated in accordance with Policy CG27.

MEPA will only consider the following uses and developments within the designated district level recreational area; an informal outdoor recreational area, a suitably designed children play area, an outdoor sports area, picnic areas, cycling tracks, an interpretation centre and related ancillary facilities including a food and drink facility. Sports related facilities are to be located adjacent to the existing Crafts School and these are to have an area not exceeding 20% of the entire designated District Level Recreational Area. The interpretation centre and food and drink facility shall preferably be provided within existing buildings on site. MEPA will support the cooperation of private agencies with Government in the provision of the facilities indicated in this policy. MEPA will not permit the development of theme or fun parks in the District Level Recreational Area.

Any permitted uses and developments within the designated area are to conform to the following additional conditions:-

- i. Development shall not cause any adverse visual or other impact on the character and setting of the area;
- ii. Development shall not damage or otherwise adversely affect the cultural or natural heritage found within the designated area;
- iii. In appropriate areas the regeneration or reintroduction of indigenous plants and animals and their habitats will be secured;

- iv. An adequate safety buffer distance is to be maintained between the planned recreational uses within the designated area and the adjacent Armed Forces of Malta site as long as the current military use of the Fort persists;
- v. Adequate and safe access for visitors to the site shall be secured before the development becomes operative, and adequate vehicle parking that does not adversely affect the setting of the area shall be provided; and
- vi. Any buildings are to be designed sympathetically with the existing landscape and located at a suitable setback from the Victoria Lines and the Great Fault scheduled area. All built development is to have the least possible footprint and is not to exceed the height of 4.75 m (one floor).
- 11.1.25 The need for the further provision of informal recreation and sports areas has been identified for the outer residential areas, including Mosta and Naxxar, since existing provision is low and demand is increasing. It is noted that whereas the recommended national standard of recreational space is of 2.4 sqm per person, the existing provision in Mosta is of 1.54 sqm per person and in Naxxar is of only 0.18 sqm per person. Therefore MEPA will fully support and encourage additional recreation and sports provision in proximity to the Victoria Lines given that this is an area which offers a suitable setting for such facilities, and since a large part of this land is in government ownership. Allowable sports and recreational facilities are to be limited to open-air facilities with landscaping so as to protect the existing setting of the area. Such facilities are intended to serve not only Mosta, but also surrounding localities.
- 11.1.26 The planned recreation and sports facilities will attract more visitors to the identified recreational walkway routes thereby making the area more popular. An interpretation centre, feature signage, picnic areas and recreational facilities including public seating are all required to allow the public to enjoy the heritage and natural assets of the area in a pleasant environment. A food and drink facility is also planned in the area as such a service is not available at present. Permitted public and tourist facilities however do not include theme or fun parks.
- 11.1.27 The area presently contains a number of under-utilised facilities including the I-Gharusa tal Mosta Garden that is barely used by the general public at present, and Fort Mosta that is currently and inappropriately used by AFM as a storage area. The appropriate use and integration of these sites with the Heritage Trail and recreational area will contribute significantly to the upgrading of the area.
- 11.1.28 In addition to the existing Crafts School, new built development will only be considered if this is considered by MEPA to be absolutely essential and provided that it is of a small scale. MEPA will not consider proposals that in its opinion result in irreversible interventions within sensitive locations.

## North West Local Plan (2006) Policies

### **Camping and Caravanning Policies**

NWRE 2 Touring Caravan and Camping Sites

The development of touring caravan and camping sites will be permitted, subject to the following criteria: -

i. Applications to comply with Policy Guidelines for Touring Caravans and Camping Sites as approved by MEPA;

- ii. the site is not located on a scheduled, designated, or protected area including the following:-
- i. Areas of Ecological Importance,
- ii. Sites of Scientific Importance,
- iii. Areas or Sites of Archaeological Importance,
- iv. Areas of High Landscape Value,
- v. Nature Reserve,
- vi. Areas designated as Public Access Zones
- vii. Special Areas of Conservation
- viii. Areas of Agricultural Land
- iii. the location, scale and layout, is consistent with protecting the landscape character of the area;
- iv. the siting has no significant adverse impact on adjacent protected areas, ground water vulnerability, or nearby settlements;
- v. the site is well related to an existing highway, the access does not cause a traffic hazard, and adequate off-road parking is provided;
- vi. no buildings/structures other than toilets and communal facilities will be permitted to be erected;
- vii. static permanently stationed caravans will not be permitted;
- viii. no tent will be permitted to be erected for a period in excess of twenty eight days:
- ix. no change of use from recreational use to residential use will be permitted;
- x. details of water supply, washing and toilet facilities, drainage and sewage disposal arrangements, refuse disposal and fire prevention shall be submitted and approved; and
- xi. a landscape scheme is submitted and approved with any permit application, which shall be implemented in its entirety within the first planting season and thereafter maintained.
- The Structure Plan identifies the need and designates a site for overnight or short stay mobile caravan and camping at Marfa, (Refer to Policy REC 11), and sites have been identified in the Marfa Action Plan which is published as a separate document. Caravan and camping sites can cause serious adverse impact on the environment, particularly on the low-lying coastal areas adjacent to popular sandy beaches. However, with a good location, layout and site management, most of these problems can be overcome. A caravan is defined as any purpose-built structure on wheels, designed or adapted for human habitation, which is capable of being, moved from one place to another and any other motor vehicle so designed or adapted. It is important to define what a caravan is, in order to avoid confusion with buildings/structures that are of a more permanent nature. Additionally, caravans must be removed from site during certain periods of the year in order to enforce the temporary use condition and also give time during the winter months for the ecology of the site to recover following periods of intensive use.
- 11.2.7 Touring caravan and camping sites can cause serious visual and environmental damage to the countryside, particularly when they have poor access, are insensitively or prominently located, or badly landscaped. Careful consideration is needed therefore, in the choice of location in order to avoid an adverse impact on the environment. Should the camping/caravan site not operate as such then the site should be reinstated to its

former natural state. This however excludes any landscaping works, which are to be retained.

# NWML 19 Anchor Bay

MEPA will not permit the development of any structure or activity, which in the view of the Authority, would adversely affect the Areas of Ecological Importance (Level 2 and 3), Areas of High Landscape Value and WWII Beach Post at Anchor Bay (as indicated on Map 35), scheduled to regulate their conservation in accordance with Structure Plan Policies RCO 1 and RCO 12, Section 46 of the Development Planning Act 1992, Scheduling of Coastal Cliffs (Government Notice 400) and Scheduling of Property (Government Notice 895).

MEPA, in conjunction with the appropriate agencies will seek to secure the restoration and maintenance of the WWII Beach Post, including a Buffer Zone as illustrated on Map 35.

MEPA will encourage the continued retention and maintenance of the former film set (illustrated as Popeye Village on Map 35) in accordance with an approved maintenance report.

MEPA may permit the rehabilitation or redevelopment of the existing ancillary buildings on land adjacent to the existing film set, (as indicated on Map 35), subject to the following criteria:-

- i. the use of the buildings shall be complimentary to the former film set and shall be located within the designated area;
- ii. the external design of the development is compatible with the general ambience of the surrounding rural and scheduled area, including materials and colours, which in the opinion of MEPA are appropriate for the location;
- iii. the containment of development within existing site boundaries as indicated on Map 35;
- iv. a maximum height of 7 m is not exceeded;
- v. the use of laser source light, sky beam, search light or any similar high intensity light for outdoor advertising or entertainment is prohibited;
- vi. details of drainage and sewage disposal arrangements shall be submitted and approved;
- vii. adequate access is provided together with off road parking; and
- viii. a landscape scheme including structural tree planting with particular emphasis to the site boundaries shall be submitted and approved with any permit application which shall be implemented in its entirety within the first planting season and thereafter maintained.

An area of land is allocated for an informal picnic area, as illustrated on Map 35. No structures or buildings shall be permitted in this area and a natural random rubble wall shall be erected and thereafter maintained.

Any development permit issued shall be subject to the submission of bank guarantees to ensure that the following works are carried out:-

- a. the restoration of the WWII Gun Post
- b. the completion of all landscaping work, and
- c. the construction of a physical boundary between the development site and the Areas of Ecological Value.

MEPA will continue to seek to secure public access to the coastline. Any permit application shall require the applicant to maintain and ensure free and unhindered public access to Anchor Bay beach.

The construction of additional new boathouses or extensions to existing boathouses will not be permitted. Existing structures that are bona fide boathouses may be rehabilitated for the storage of boats/fishing equipment or utilised for water recreation purposes, subject to the following criteria: -

- i. the structure has access to the existing slipway;
- ii. the structure/building must be of single storey in height, and maintained to a stone coloured standard;
- iii. the structure must not be used as a holiday home, not for any form of residential or commercial use; and
- iv. the submission and approval of a comprehensive management plan for the maintenance of the structures.

The site indicated on Map 35 shall be investigated for the possible inclusion of a caravan site.

- 17.5.1 The purpose of this policy is to achieve an overall containment, enhancement and maintenance of the development known as Popeye Village. II-Prajjet "Anchor Bay" is situated directly to the west of Mellieha Bay in an area of natural scenic and rural beauty. The coastal area is a dramatic, wild and remote near-vertical cliffed headland, with debris slopes, fallen blocks and bare limestone garrigue above. There is little cultivation and the most conspicuous man made features being "Popeye Village" (former film set). There is degraded land in close proximity to the Village caused by illegal dumping, indiscriminate vehicular access beyond existing roads and derelict agricultural land with collapsed stonewalls.
- 17.5.2 MEPA recognises the coast as one of the Island's most valuable natural resources, and in accordance with Structure Plan Policy, will rigidly continue to control development of Areas of Ecological Importance, Areas of High Landscape Value and Scheduled Property (WW2 Beach Post).
- 17.5.3 The maintenance of the former film set will be encouraged and supported. The rehabilitation or redevelopment of the existing buildings located to the east of the film set may be permitted subject to strict planning criteria. Any additional development shall be complimentary to the former film set/ film industry. No extension of the designated area will be permitted and any facility provided must not have an adverse impact on the environment. Landscaping will be required in order to mitigate impact and should comply with the supplementary planning guidelines on trees shrubs and plants for planting and landscaping in the Maltese Islands of 2002.
- 17.5.4 The existing structures that are bonafide boathouses, located below the film set on the foreshore, may be rehabilitated for boat storage or water recreation purposes. The existing boathouses/structures have access to a communal slipway that does not restrict access to the foreshore and benefit from a retaining wall that gives protection against wave erosion.

**Caravan:** Any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer), and any motor vehicle so designed. This definition is also applicable to mobile homes.

# **Picnicking Policies**

# Country Parkways

- 11.2.11 An important function of the Local Plan is to encourage provision of opportunities for recreation in order that tourists and residents can participate in greater enjoyment of the countryside.
- 11.2.12 The Structure Plan proposes the designation and implementation of Country Parkways which are essentially linear open spaces and their immediate surroundings within which a variety of open air recreational activities will be located. The Local Plan identifies parkways that will link recreation and tourist attractions by tracing routes through areas that are of intrinsic natural or man made value. They may be used for walking, hiking, jogging, orienteering, school outings for educational purposes, horse-riding, and archaeological and historic specialist group

## - NWRE 5 Country Parkways

MEPA in conjunction with the appropriate agencies, will seek to establish a network of country parkways, coastal and inland rights of way for footpaths, cycle routes and horse riding trails.

Country Parkways identified are indicated on Map 11 in the following locations:-

- i. Linear parkways along the ridge of the Victoria and Dwejra Lines;
- ii. Linear river valley and lakes park from Ta' Qali National Recreation Centre to Chadwick Lakes, along Wied il-Qlejgha;
- iii. Linear parkways along the western coastal cliffs joining L-Imtahleb to Fomm irRih;
- iv. II-Buskett to Wied il-Kbir; and
- v. Wied iz-Zurrieg to Ghar Lapsi.

Existing infrastructure in terms of roads, carriageways, rights of access and footpaths will be utilised wherever practical. This will reduce further impact on the natural environment.

Public access to the designated parkways must be safeguarded. The leasing or sale of government land must be prohibited within a 50m corridor on either side of proposed country parkways as measured to the nearest convenient permanent physical boundary.

- 11.2.13 The Country Parkways will involve the provision of safe access and parking; routeway enhancement including picnic, play, exercise and barbecue areas; and occasional facilities in the form of bench seating, and route and interpretative information signs. Leisure cycling is also a potentially important recreational activity in Malta, not only for the islanders but for off-peak tourists, if the correct facilities can be provided. The provision of Country Parkways could provide an excellent opportunity for leisure riding which although usually unorganized and sporadic may be combined with other activities such as picnicking.
- 11.2.14 An additional linear parkway to those outlined in Structure Plan Policy REC 13 along the western coastal cliffs is proposed to link Wied iz-Zurrieg to Ghar Lapsi. This links

- up with the Structure Plan proposal and provides a complete parkway system along the western coastal cliffs of the Local Plan Area.
- 11.2.15 The appropriate authorities will be encouraged to participate in management schemes in order to provide good public access by public transport as well as private car. Adequate parking facilities must be provided together with toilet facilities.
- 11.2.16 The parkways will provide access from the urban settlements to the countryside and also be integrated into a long distance footpath system. (Refer to Policy NWRE 6).
- 11.2.17 A programme of landscape enhancement must be encouraged in order to develop a sustainable approach to the provision of recreation by way of country parkways, thereby safeguarding landscape character and quality.
- 11.2.18 Management of the countryside is an untried technique in Malta and will require careful consideration, but will be the essential ingredient for the provision and maintenance of a parkways system. It is envisaged that Local Councils will play a major role in management of the parkways and footpath systems.

#### NWRE 7 Picnic Areas

MEPA will encourage Local Councils to provide and maintain picnic areas in appropriate locations including specific designated sites as indicated on Map 11 as follows:

- i. Burmarrad National Country Park;
- ii. Buskett:
- iii. Chadwick Lakes;
- iv. Ghar Lapsi
- v. Kennedy Grove;
- vi. Tat-Tomna, Mellieha
- vii. Ta' Qali Recreational Park;
- viii. Ta' Ras il-Gebel, Mgarr;
- ix. Ta' Darrenzi Woodland, Mgarr;
- x. Victoria Lines, and
- xi. Sites identified by Marfa Action Plan policy MRE 5.

Development permission of designated and any other additional picnic areas will be subject to the following criteria: -

- i. The design and layout shall have regard to the characteristics of the area in order to minimize any adverse effect on the character of the adjacent landscape;
- ii. The siting has no significant adverse impact on any scheduled, designated or protected area of ecological, scientific, visual, historic, archaeological or agricultural value;
- iii. Preference will be given to areas which are in public ownership and which currently are in a dilapidated state. Picnic areas will not be permitted within 10 metres of the coastline;
- iv. The site is well related to an existing highway/access and does not cause a traffic hazard, and off-road parking is provided:
- v. Details of washing and toilet facilities shall be submitted and approved together with the details of drainage and sewage disposal arrangements;
- vi. No static or touring caravans, tents or other temporary accommodation will be permitted; and

- vii. A landscape scheme is submitted and approved with any permit application, which shall be implemented in its entirety within the first planting season and thereafter maintained
- 11.2.20 Picnicking opportunities with support facilities are relatively scarce on Malta and a need exists for officially recognised, sensitively designed and equipped picnic areas. This policy identifies a number of potential sites for the provision of such areas but other locations will also be considered provided the above criteria are met.

## - NWRE 8 Heritage Trail at the Victoria Lines

MEPA recognises the Victoria Lines as a critical asset because of their recreational, cultural, historical and educational resource value, which therefore merit conservation and protection. MEPA in conjunction with the relevant Local Councils and other appropriate agencies will support the creation of a Heritage Trail at the Victoria Lines, as indicated on Map 12.

- 11.2.21 The Victoria Lines are also designated, as indicated on Map 12, as an Area of High Landscape Value within which no development of any structure or activity, which in the view of the Authority would adversely affect the landscape value, will be permitted. (Refer to Policy NWLA 2).
- 11.2.22 The Victoria Lines were built over the Great Fault, which divides the Island in two parts. The use of this natural barrier for defensive purposes can be traced back to prehistoric times. The Knights in 1722 and subsequently the British systematically utilised these natural defensive qualities. The Lines constitute a series of fortifications spanning some 12 kilometres, built by the British Armed Forces between 1870 and 1899. They consist of four polygonal styled forts, a number of batteries, magazines, searchlight emplacements, stop-walls and a continuous infantry wall, which connects the features together to form a single line of defence from coast to coast.<sup>2</sup>
- 11.2.23 Although the fortifications failed the test of defensive effectiveness immediately after their completion they still provide a very interesting insight into the development of military engineering techniques, form an intrinsic part of Malta's historical heritage and symbolise British Imperial dominance in the Mediterranean. This site is included in the Tentative List presented by the Government of Malta to UNESCO's World Heritage Centre.
- 11.2.24 A MED-URBS project to develop heritage tourism in Malta, initiated by local councils, proposes that the Victoria Lines be designated as a Heritage Trail. The scheduling of the Victoria Lines protects the lines and all ancillary systems including the heritage trails.
- 11.2.25 Any project related to the development of the Victoria Lines Heritage trail will follow all the criteria established by UNESCO and the restoration and rehabilitation of the same will follow a programme established by a Management Committee.
- 11.2.26 The objectives for the creation of a heritage trail are:
  - i. to conserve and protect the Victoria Lines including all historical features, landscape character, ecological and scientific features;
  - ii. to increase public awareness of their value to the local and world heritage; and
  - iii. to create a heritage/walking trail along the lines for cultural tourism.

- 11.2.27 Suggested walks to the Victoria Lines are indicated on Map 12, which also indicates its inclusion in a system of proposed Country Parkways.
- 2) the Victoria Lines (Souvenir Guide) Ray Zammit

#### - NWMT 10 Recreational Area

The site indicated on Map 67 is being allocated for the provision of informal and passive recreational facilities. Only the provision of facilities/equipment, which enhance the potential of the site for informal, passive recreation, will be permitted, provided they do not harm any mature trees and do not have an adverse impact on the amenity of adjacent residential blocks through the generation of noise and an excessively higher level of activity within the site. No built development is envisaged for this site.

23.2.19 Mtarfa is characterised by substantial landscaped areas, which soften the impact of the buildings and provide an aesthetically pleasing setting to the town, especially when viewed from the surrounding areas of high landscape value. These areas are mostly located on steep slopes with very restricted access making their use for passive recreation very difficult. This site, on the other hand, has good access and can be used for picnics and similar passive recreational activities. Its use can also be combined with the sports facilities but it must be ensured that any further activities do not harm the intrinsic characteristics of the site or the amenity of adjacent uses.

#### - NWBU 1 II-Buskett Action Plan

The area indicated on Map 10, is identified as the II-Buskett Action Plan area, as defined under Section 26 of the Development Planning Act (1992).

- 26.1.1 MEPA will prepare an Action Plan in conjunction with the Department of Agriculture. There is an urgent need to re-establish the general principles for the future of II-Buskett in a land use framework consistent with the objectives of the Structure Plan and the North West Local Plan.
- 26.1.2 The location known as II-Buskett lies 1.8 km due south of Rabat and 1 km to the east of Had-Dingli. (Map 10) and is approximately 1.13km² in area.
- 26.1.3 During the late 16th century a large fortified palace (Verdala) was built on the northern flank above the valley. During this period intensive efforts were made to afforest the valley slopes, and these gradually developed into Malta's largest seminatural woodland.
- 26.1.4 Much of the present day layout dates back to the 17th century, when orchards were planted and were supported by an irrigation system. Vineyards and conifers were planted on the hillside terraces, and a number of ponds were constructed.

### 26.1.5 **Current Situation**

a. Agriculture - An area of approximately 0.1 km² consists of agricultural land and citrus orchards (along the valley floor and on the lower slopes) and vineyards on higher ground. However some areas of garrigue have also been damaged

- in an attempt to convert the land into agricultural use, and a pig farm has been established on the plateau area.
- b. Ecological and Scientific Importance II-Buskett provides a unique ecosystem supporting many uncommon and endemic species since it incorporates a whole variety of important communities - woodland, watercourses, maquis, garrigue, caves and cliffside, all concentrated within a small area, and scheduled as an Area of Ecological Importance.
- c. Landscape Value- The area is scheduled as an Area of High Landscape Value.
- d. Recreation The environment at II-Buskett creates an attraction for large numbers of people seeking recreation. Activities include picnicking, camping and barbecues, which together with the high volume of vehicle traffic especially during the weekends cause an adverse impact on the natural environment of the area. The Buskett Roadhouse, situated within the vicinity of II-Buskett, occupies an area of 5156m²; with its restaurant and discotheque it also attracts a considerable number of vehicles to the area.
- e. Nature Reserve II-Buskett has been declared a Nature Reserve under the Environment Protection Act (1991). However, the area is still popular for hunting which, because of II-Buskett's protected status, is illegal. Construction of trapping sites and hides has damaged garrigue, and trees and rubble walls have been mutilated.
- f. Historical Aspects II-Buskett and its immediate surroundings contain a number of historic buildings, which constitute a valuable resource, which should be put to a more appropriate use in order to preserve their intrinsic character and the integrity of their surroundings.

## Strategic Background

- 26.1.6 II-Buskett is located within a Rural Conservation Area and is subject to policies designed to afford the necessary protection to, and enhancement of, the countryside. The purpose of the Structure Plan in designating Rural Conservation Areas is to protect the rural environment.
- 26.1.7 II-Buskett and its surrounding area are considered to be especially relevant in the context of these objectives. Structure Plan Policies also seek ways in which the interests of agriculture can be compatible with areas of scenic and ecological importance.

[...]

# 26.2 Action Plan

26.2.1 The need for an Action Plan for Il-Buskett. It is proposed that Il-Buskett is identified as an Action Plan Area under Section 26 of the Development Planning Act 1992 in order to provide a legal and planning framework. The Action Plan for Il-Buskett will form an important part of this local plan but will be published as a separate document. In order to ensure the conservation of the Il-Buskett, it will formulate guidance for land use, maintenance and enhancement for the area throughout and beyond the 10-year life span of the Local Plan. It will examine in detail the current situation at Il-Buskett in terms of landscape and conservation, recreation, agriculture, preservation of historical features, inappropriate development, traffic and parking problems, as well as recognising the opportunities for the future. The policies and suggestions in the Action Plan will be formulated after a public consultation procedure, and discussions with various public and private

- organisations concerned with the area. The views and concerns of these organisations will be evaluated and incorporated within the plan.
- 26.2.2 Aims and Objectives of the Action Plan. To maintain and enhance the character and quality of the II-Buskett area and to increase public awareness of the attributes of agricultural, landscape, ecological, recreation, conservation and cultural value.

# 26.2.3 Objectives:

- To re-establish general principles for the future of the II-Buskett within a land use framework consistent with the objectives of the Structure Plan and North West Local Plan;
- ii. to define a boundary for the Action Plan Area including a buffer protection zone;
- iii. to schedule Areas of Ecological Importance and Sites of Scientific Interest;
- iv. to maintain and enhance agricultural land whilst safeguarding Areas of Ecological Importance and Sites of Scientific Interest;
- v. to protect and enhance the historical association of the area including the scheduling of historic buildings in order to regulate their conservation;
- vi. to realise the potential of II-Buskett as an outdoor recreation area compatible with the protection and conservation of its natural habitat and environment;
- vii. to highlight the need for a management structure involving all interested parties including the public; and
- viii. to promote public awareness of, and interest, in the conservation of II-Buskett, as a means of assisting in the realisation of the aims and objectives of the Action Plan.

# **South Malta Local Plan Policies**

### **Camping and Caravanning Policies**

# - SMTO 03 Camping and Touring Caravan sites

MEPA will consider proposals for the provision of camping and touring caravan facilities along the eastern coastal stretch of the Local Plan area at Zonqor Point (Marsascala) and in the St. Thomas Bay area (Marsascala), subject to the following criteria:

- i. Applications comply with Guidelines for designated Camping Sites as approved by the MEPA and the Guidelines for caravan sites upgrading in Malta, copies of which are included in Appendices C1 and C2;
- ii. The site is not located on a scheduled, designated or protected area including Areas of Ecological Importance, Sites of Scientific Importance, Areas or Sites of Archaeological Importance, Areas of High Landscape Value and Nature Reserves:
- iii. The location, scale and layout is consistent with protecting the landscape character of the area;
- iv. The siting has no significant adverse impact on adjacent protected areas, ground water vulnerability, or nearby settlements and will result in an overall improvement of the surrounding environment;
- v. Access to the site does not cause a traffic hazard and adequate off-road parking can be provided;

- vi. No buildings/structures other than toilets and communal facilities will be permitted to be erected. Details on water supply, washing and toilet facilities, drainage and sewage disposal arrangements, refuse disposal and fire prevention will be provided as part of the development application;
- vii. No static permanently stationed caravans will be permitted;
- viii. The use of concrete paving and walling, canopies, and fixed tables and benches is not permitted;
- ix. The development proposed will in no way restrict coastal public access to any part of the coastal area;
- x. No change of use from recreational to residential or other built use will be allowed and should the development be discontinued the site should be reinstated to its natural state; and,
- xi. A landscaping scheme is to be submitted and approved with any permit application, which shall be implemented in its entirety within the first planting season and thereafter maintained.
- 9.4.3 The Structure Plan does not identify any areas for camping and touring caravan facilities in the plan area. There is, however, a growing demand for such facilities in the plan area but no official facilities to cater for this demand are available. The Tourism and Recreation Community Survey undertaken by the MEPA in 1997 indicates that 4.6 % of the population in the plan area own a tent or caravan and this percentage is likely to increase in future once official sites are available. On the other hand, abusive camping/caravanning activity creates adverse impacts on the environment and landscape unless appropriate sites are identified, properly planned, designed and managed. Care is needed in the choice of location in order to avoid an adverse impact on the environment.

## - SMMS 08 St. Thomas Bay Coastal Recreation Area Action Plan

MEPA will prepare an Action Plan for the St. Thomas Bay Coastal Recreation Area, as indicated on the Marsascala Policy Map MS 2. This area is designated primarily for coastal recreation and related facilities (e.g. beachrooms). In the interim period prior to the finalisation and approval of the Action Plan, no extensions to existing beachrooms or additional beachrooms will be permitted and change of use from holiday accommodation to permanent residential or commercial use will not be permitted.

The Action Plan for the St. Thomas Bay Coastal Recreation Area will provide guidelines with regard to the improvement of the area and existing beachrooms, designate appropriate sites for the provision of common facilities (e.g. car parking, children's play area), designate sites for camping and caravanning, recommend improvements of the promenade along the St. Thomas Bay coastal stretch, and identify measures to encourage a co-ordinated action to improve the management of the area and encourage landscaping to minimize the potential negative impacts. The Plan will also identify time frames for implementation, monitoring, maintenance and upgrading programmes.

- 18.4.11 A number of beachrooms have been constructed around St. Thomas Bay. The Local Plan recognizes that such facilities have developed in the area, unfortunately in a haphazard manner.
- 18.4.12 The site covered by this policy has a site area of about 70,000 m². It is estimated that there are approximately over 140 beachrooms. This policy seeks to contain the further expansion of such developments and advocates the preparation of an Action Plan to guide any development in and management of the area. The plan will recommend

measures for the provision of additional facilities in appropriate areas and to improve the overall amenity of the area whilst ensuring that the coastal resources are protected and not degraded.

# **Picnicking Policies**

# - SMRE 01 Provision and Retention of Recreational and Sports facilities

The MEPA will encourage the development of new and the improvement and upgrading, as well as extension, of existing recreational/sports facilities within the urban settlements, provided this will not create any significant adverse impacts to the locality, as well as the multi-use of existing facilities whilst ensuring their retention. Any redevelopment proposals should include adequate landscaping measures.

The provision of appropriately located picnic areas in the countryside is encouraged provided that it is ensured that the facilities provided will not create negative impacts on the surrounding environment and can be properly managed.

The MEPA will not allow any development that results in the loss of existing urban and rural public recreational/sports facilities including existing or designated public gardens and amenity open spaces unless otherwise stated in other policies in this plan.

Proposals for new or extensions to and upgrading of existing sports facilities in the rural areas should adhere to the following criteria:

- i. a study has to be undertaken to justify the need for the new facility or the upgrading/extension of the existing facility (this study shall be based on demographic projections and realistic assumptions which demonstrate the requirement for additional facilities);
- ii. the proposed development will not result in the loss of good quality agricultural land;
- iii. the proposed development is not located on scheduled, designated, protected or garrigue area or land which qualifies to be scheduled and with regard to a new facility is the result of a thorough site selection exercise;
- iv. any proposed structures are to be limited to a building height of one floor, unless it can be demonstrated that an additional floor is necessary and will not result in an adverse visual impact;
- v. the site proposed requires substantial environmental improvement;
- vi. the location, scale and layout is consistent with protecting the landscape character of the area;
- vii. the development will not create significant adverse impacts on adjacent protected areas, ground water vulnerability, or nearby settlements and their communities;
- viii. access to the site does not cause a traffic hazard and adequate off-road parking can be provided within the curtilage of the site, where possible;
- ix. no change of use from recreational to residential will be allowed and should the development be discontinued the site should be reinstated to its natural state in line with rural conservation area policies;
- x. a landscaping scheme is to be submitted and approved with any permit application which shall be implemented in its entirety within the first planning season and thereof maintained; and

- xi. development of major impact sports are to directed towards appropriate disused quarries and areas requiring substantial environmental improvements.
- 9.4.4 This policy aims to protect existing recreational/sports facilities and encourage the provision of additional facilities through new developments or upgrading of existing facilities. Due to the scarcity of land the duplication of facilities is not considered appropriate and therefore the multiuse and improvement of existing facilities is encouraged and the relevant authorities are to put into place appropriate mechanisms to encourage such initiatives.
- 9.4.5 Sports facilities proposed ODZ will need to be carefully examined and a site selection exercise will have to be undertaken by the developer which would include the shortlisting of sites amenable for the development being proposed whilst adhering to the conditions identified in this policy. The use of disused quarry sites encouraging the rehabilitation of such areas and a complete upgrading of the site should be considered. The Plan recognises that some sports facilities, by their nature, are not acceptable within urban areas (e.g. shooting ranges, motor sports) and would have to be located outside the development zone boundary.

## -SMRE 02 Walking & Cycle routes and heritage trails in urban and rural areas

The MEPA will encourage Local Councils, NGOs as well as other public and private agencies to promote the development of and the maintenance of walking and cycle routes and heritage trails in all urban settlements and in the following rural areas, although this list is not exhaustive:

- i. Tas-Silg, Il-Munxar, Il-Bidni and Latnija (Marsascala)
- ii. Ix-Xaghra, Bur Maghlub, Ta' Haxun, Wied Saptan and Tal-Garda (Ghaxaq)
- iii. Wied Xkora, Wied Musa, Wied Hesri, Wied Qirda, Wied IL-Kbir and Hal-Xluq (Siggiewi)
- iv. Tal-Gawhar, Il-Qortin, Ta' Taht it-Torri, In-Nadur, Wied Babu and Iz-Ziju (Zurrieg)
- v. Coastal stretch between Xghajra, Zabbar and Marsascala
- vi. Wied Garnaw (Sta' Lucija) and Gudja
- vii. Hal-Millieri and Ta' L-Isqof (Mqabba)
- viii. Lawrenti, San Blas, Tal-Plieri, Girgenti towards Buskett and Rabat (Siggiewi)

Where appropriate walking routes and heritage trails will incorporate tree planting schemes and picnic areas as well as the provision of appropriate interpretive facilities. A management programme that clearly indicates responsibilities and accountabilities, phasing of projects, implementation and maintenance programmes are to be submitted with any proposals or development applications.

- 9.4.6 The provision of well planned and managed walking routes and heritage trails with ancillary interpretive facilities encourages increased awareness of the urban and rural heritage and thus encourages their protection. The MEPA will offer agencies, particularly local councils, any assistance in planning and setting up such routes and trails. Local Councils and other agencies are encouraged to plan and manage such initiatives within all urban settlements which would highlight the various heritage resources present in all localities comprising the plan area.
  - SMIA 12 District Park along the Cottonera Lines

MEPA designates the area in Fgura and Zabbar bounded by Wied Blandun and the Cottonera Lines, as indicated on the Fgura and Zabbar Policy Maps FG 1, ZA 1 and ZA

2 for the setting up of a District Park which would primarily cater for informal recreational activities which would include children play areas, picnic areas and seating facilities as well as jogging trails, cycling tracks and similar low key sports facilities, and expansion of existing facilities, if appropriate, provided that such development does not in any way compromise the historic and architectural character of the Cottonera fortifications and Wied Blandun.

An Environmental Management Plan, incorporating details of a landscaping scheme and mechanisms to be used for the monitoring of the Plan, in line with the provisions in SMCO 09, is to be submitted for the entire area specifying the facilities to be provided as well as an interpretive plan to enhance the awareness towards conserving and understanding the Cottonera fortifications and Wied Blandun. A pedestrian path is to be provided along the entire length of the fortifications.

#### Any development proposed, shall:

- i. make use of existing derelict buildings;
- ii. not encroach upon or adversely affect protected areas or sites of archaeological, ecological, scientific and historic importance, and appropriate mitigation measures as required by the MEPA and other relevant agencies will have to be implemented; and,
- iii. not exceed the height of 4.75m (one floor)

MEPA will support and encourage cooperation and liaison between Government departments, Zabbar and Fgura Local Councils and private agencies, including NGOs, interested in the implementation of this project.

- 12.5.1 This is the main green lung between Fgura, Zabbar and the Cottonera lines and through improvements will provide a much needed semi-natural recreational space to compensate for the lack of recreational space within the locality of Fgura. This should also enhance the protection of the fortifications. The existing sports facilities need upgrading (to include dressing rooms and proper parking facilities), particularly the one in Fgura. The District Park would provide increased recreational space to residents of Fgura, Zabbar and the Three Cities. Fgura currently has only about 5000 m² of space for informal recreation (playing grounds, seating areas) giving a density of 0.1 m² of recreational space within urban areas per resident. Zabbar too has a low recreational provision per person (only 0.4 m²). The average for the whole SMLP area is 2.1 m².
- 12.5.2 For the purposes of this policy The District Park will extend from Wied Blandun (which is scheduled a Level 4 AEI and Level 1 SSI) towards the afforested land, popularly known as "IIFoss", in front of is-Sur ta' San Klement (limits of the Fgura) up to the agricultural land facing Triq Santa Liberata (on the opposite side of Capuchins convent). The existing afforested area presently consists of olive groves and other trees covering an area of around 80,000 sq.m. and is divided into three areas namely, Tal-Hawlija Public garden, Notre Dame Walkways and St. Clement Picnic Area.
- 12.5.3 The establishment of a District Park (approximate size 290,000 m²) would also secure a permanent strategic settlement gap between Cottonera fortifications and Zabbar and Fgura without the need to modify the development boundary to attain this objective. Besides, the lack of a District Park in the South, which would have a similar function as Ta' Qali in the Central/North part of the Island has long been felt particularly in this region characterized by high-density settlements of Fgura,

Tarxien and Zabbar all of which act as suburbs to the heavily industrialized Cottonera area.

#### SMIA 13 National Parks

This local plan designates the area known as L-Ghassa tal-Munxar (Marsascala) and the coastal stretch between II-Ponta taz-Zonqor (Marsascala) and Blata I-Bajda (Xghajra), as indicated in Policy Maps MS1, MS2, XA1 and ZA1, as National Parks primarily for informal recreation (e.g. walking, cycling) and the appreciation of the ecological, geological, archaeological as well as cultural-historical features of these areas. Within these parks priority will be given to the conservation, protection and improvement of the natural and cultural-historical heritage. Positive provision will also be made for receational uses consistent with this objective. Limited commercial development related to the needs of the visitors will be considered as will be identified by the Management Plan to be prepared for each of the areas and which would include the following:

- a. A land-use survey of the areas;
- b. Identification of permitted uses;
- c. Visitor management facilities, including interpretation provisions;
- d. Any environmental improvements required
- 12.5.4 These two stretches of coast are important ecological, geological and cultural areas due to the variety of features an elements present in these areas ranging from salt pans to fortifications to a number of important ecological habitats. This policy seeks to maximize the recreational use of the site whilst protecting and providing for the appreciation of the rich heritage of these areas. The Management Plan for each area is important since it will provide the basis for the setting up of the national parks and identifies the permitted activities and developments. A number of features require immediate attention e.g. Ducluseaux Battery

### Gozo and Comino Local Plan (2006) Policies

## **Camping Policy Comino**

Camping is becoming relatively more popular on Comino. An area designated for camping lies at the head of *il-Bajja ta' San Niklaw*. This area happens to be ecologically sensitive and scheduled as an Area of Ecological Importance and a Site of Scientific Importance. A better site would be one which uses an already disturbed patch of land which lies within easy reach of accessible coastline. A detailed land-use study on Comino has indicated that there are a number of disturbed sites near the Comino Hotel and near the Nautico complex.

GZ-Ghjn-10: The existing unofficial camping site at il-Bajja ta' Santa Marija shall be immediately closed down and this important site rehabilitated following detailed scientific studies of the area. As an alternative, the site indicated on MAP 14.2-A1 shall be designated as a safeguarded area for camping activities. These sites are to be managed and provided with all basic amenities such as showers, toilets and rubbish collection facilities.

# Rambling, Cycling and Picnicking Gozo

Recreation is a fundamental component of modern civilized life. It is therefore imperative to provide facilities for formal and informal recreation in order to enhance amenity in an area. In the case of Gozo and Comino, special emphasis should be given to the utilization of rural areas for informal recreational purposes. Informal rural recreation is an activity whereby enjoyment of the site is provided free of charge and where the level of active control of activities is limited to a minimum. It is possible to devise investment-recouping schemes without resorting to an entry fee (e.g. charging for interpretation services). Such areas should invariably be managed by public agencies or NGO's monitored by a public agency. The construction of new built facilities should be avoided giving preference to upgrading of existing ones. The general objectives in the Structure Plan encourage the provision of opportunities for recreation in a coordinated manner to ensure that sites for an adequate range of facilities are included in local plans. Rural recreation is considered as an important component of informal recreation. To this effect, the Structure Plan for the Maltese Islands contemplates a number of planning initiatives. Policies REC 13 and REC 14 indicate the creation of a network of country parkways, coastal and inland rights of way for footpaths, cycling routes and horse riding trails.

GZ-RECR-1: Proposals to encourage informal rural recreation will be given favourable consideration provided that the following conditions are observed:

- a) physical intervention shall be limited to the re-instatement of pre-existing rural features and upgrading of existing countryside lanes to facilitate walking for pedestrians;
- b) proposals to encourage pedestrian and vehicular segregation along existing carriageways will be favourably considered provided that vehicular circulation, safety and environmental considerations are all taken into account;
- proposals to introduce new access for vehicular traffic shall not be considered; the creation of new routes (pedestrian or otherwise) on garrigue, through boulder screes or other environmental sensitive areas shall be prohibited;
- d) where existing routes pass through ecologically important sites that would be negatively affected by trampling, such as sand dunes and marshlands, their continued use shall be subject to the findings of a detailed ecological impact assessment. If the findings of the assessment indicate that continued use of the route will cause damage to the ecological areas, the route will be closed down and nearby detours considered within the light of the ecological impact assessment:
- e) additional soft landscaping of an informal nature will be favourably considered. All planting shall conform to the criteria of the Guidance on Planting.

A number of sites which qualify for specific types of informal rural recreation are indicated in the relevant area policies.

## Circular walkways

The rural character of Gozo presents many opportunities to encourage walking, cycling or horse-riding. The main constraints to these activities include:

- a) Relatively steep topography
- **b)** Adverse weather conditions (e.g. exposure to hot sun, high winds, torrential rain or high levels of humidity)

- c) Sharing of many carriageways with vehicular traffic (especially on narrow carriageways
- d) Lack of interpretation facilities along the routes
- e) No defined circular walking/cycling routes

It is rather difficult to address factors a) and b) but c), d) and e) can be addressed. It is possible to create a number of circular routes starting within the urban centres and integrating the urban experience with rural walking routes. Given the light traffic loading on the Gozo routes, it is also possible to contemplate a system of sharing the same carriageway between pedestrian and vehicular traffic. This is especially relevant during the weekdays in winter (i.e. the best time to enjoy the Gozitan landscape) when vehicular traffic is even lighter. Policy GZ-RECR-1 has already indicated interventions that can be undertaken with respect to rural recreation and it is recommended that some of the relevant informal recreation facilities are provided along the walking routes.

GZ-RECR-3: Proposals for upgrading walkways indicated on MAP 10.3.3 will be favourably considered by MEPA provided that all the following criteria are observed:

- a) the proposal shall include one or more whole circular routes wherever possible;
- b) a management programme that clearly indicates responsibilities and accountabilities, phasing of projects, implementation and maintenance programmes, will be prepared and submitted together with the planning application; and
- c) proposals for the creation of new pedestrian routes (i.e. excluding vehicular access) other than those indicated on MAP 10.3.3 will need to be strongly justified. The creation of new pedestrian routes on garrigue or boulder screes shall be prohibited.

#### **Cycle Routes and Related Facilities**

There is a real opportunity to promote cycling in parts of Gozo. The short distance of many trips, the relatively flat terrain to the west and south of Rabat and towards Qala makes cycling a realistic option for some. Not only is cycling cheap and healthy, but it can be a convenient way to undertake short journeys if facilities are provided and if it is actively promoted. Cycling is also a pleasant recreational pursuit. In countries like Denmark, Holland and Belgium a wide range of physical and promotional measures are used to make cycling safer, convenient, and attractive. These could be appropriately adapted to Gozo to positively encourage greater levels of cycling.

Many parts of the proposed network are inherently suitable for cycling because of low traffic flow levels. In some cases the road surfaces will need improvement to increase comfort and safety. Along the busier roads it may be appropriate to use road markings to define the cycle ways and at busy junctions additional measures may be required.

In the first instance, it is anticipated that the network would primarily be used by tourists, which would complement the desire of the Malta Tourism Authority to promote greater ecotourism in Gozo. However, for the network to be popular, it is important that it is of a high quality and standard, suitably designed and promoted by the appropriate authorities.

The proposed network focuses on areas where the terrain is in general either relatively flat or moderately steep. This will not prevent more enthusiastic cyclists from venturing into the

more hilly and remote parts of the island. This will be dependent on them having access to good, detailed maps of Gozo.

#### **GZ-TRAN-6**:

MEPA will support the introduction a network of cycle ways, particularly in the less hilly parts of the island, as shown on MAP 6.2.6. Initially, this network would provide good cycling conditions for tourists, but in the longer term it could encourage more Gozitans to undertake short trips by bicycle. The network should include complementary measures such as secure cycle parking in pedestrian zones and at major tourist attractions, traffic management to aid cyclists, and promotional schemes (e.g. leaflets and educational campaigns) to encourage greater levels of cycling.

Development permission will not be granted for developments that will jeopardize this network, and major developments located close to it may be expected to contribute towards it and associated measures

# North Harbours Local Plan (2006) Policies

# Walking, Cycling and Picnicking Trails

# - NHRL06 Walkways/Heritage Trails/Cycle Routes

MEPA will promote the development of recreational walkways/cycle routes and heritage trails based on the provision of circular routes and access from urban settlements to the countryside and the coast. Existing and proposed long distance footpaths will be protected from any development that would adversely affect their route or character. Where appropriate, these routes will incorporate tree planting schemes and picnic areas.

MEPA in conjunction with Local Councils and other agencies will implement the way marking of walkways/cycle routes/heritage trails and public access ways in order to protect rights of access. MEPA will also seek to improve pedestrian linkages between the Outer Harbours area and the more urbanised Inner Harbours Area. Wherever feasible and desirable, improvements to public access will normally be required when new development takes place in the countryside, especially where links can be created from settlements into the countryside.

MEPA may require that an Environment Management Plan (EMP) be formulated and approved prior to the implementation of walkways/cycle routes/heritage trails and public access ways. These proposed routes are to follow the guidance and recommendations set out in these EMPs so as to ensure that all environmentally important areas are protected and upgraded, and so that environmental impacts are minimized.

The promenade spanning from St. George's Bay to Pieta, as indicated in Map TR1, will be protected and upgraded. In particular, MEPA will ensure that the following criteria will be strictly adhered to in any proposal that is likely to affect this promenade;

- i. The continuity of the promenade will not be interrupted in any way;
- ii. The promenade will be maintained at a sufficient width that is necessary to allow uninterrupted heavy pedestrian flows throughout its length;

- iii. Temporary and permanent structures, and the placing of tables and chairs, will not be allowed where these will compromise the use of the promenade by interrupting heavy pedestrian flows; and
- iv. Temporary and permanent structures that obstruct views to the sea will not be allowed.
- 9.4.19 A comprehensive network of heritage trails/footpaths and cycleways enhances access to urban open space, to the countryside and coast. It should be a general principle of development that opportunities be taken to extend such public access, particularly where open spaces can be linked. Greater use of the coast and countryside gives considerable benefits from the point of view of health.
- 9.4.20 Suggested routes identified for consideration include:
  - Pembroke Circuit circular coastal route linking the main military sites in the area namely the Qalet Marku Tower, St. George's Tower and Madliena Tower.
  - Forts Circuit a linear route linking two important forts (Madliena Fort and Pembroke Fort).
  - Wied Ta` Kalci Circuit a route, that exploits the natural beauty of Wied il-Kbir and Wied Ghomor.
  - Wied Ghollieqa Route a route that provides access on foot to the University from the San Gwann side.
  - Wied Ghomor Route as detailed in Policy NHSW06.
  - Wied id-Dis Route a route that passes along a beautiful valley and links with the Victoria Lines.
- 9.4.21 Furthermore, cycling is a new activity in Malta, but expansion is severely inhibited by the limited road network, the physical condition of many roads, the number of motor vehicles, competing uses and driver behaviour.
- 9.4.22 Leisure cycling is usually unorganised and sporadic but may be combined with other activities such as picnicking. The choice of an area requires a location with limited traffic and easy parking, so that bikes can be transported by car and then used. Cycling routes could be combined with other recreational activities such as horse riding, walking and picnicking provision.
- 9.4.23 Of great importance is the existing Coastal Walkway Route that starts from St. George's Bay and goes all the way round the coast up to Pieta` measuring an impressive length of 10.5 km. This Route constitutes the one single most important leisure asset in the local plan area since it serves for the enjoyment of the coast and provides the pedestrian with magnificent views of St. George's Bay, Spinola Bay, Balluta Bay, Marsamxetto Harbour and Valletta. A large extent is intensively used for walking, however some parts need to be upgraded. This route links with other main routes in the NHLP area.

### Marsaxlokk Bay Local Plan (1995) Policies

# **Camping Site**

- MV05 Camping Site at II-Mara

After dumping at II-Mara has ceased to take place in line with policy MV04, and the site reclaimed, it is considered to be suitable as a camping area.

No official camping site exists in Malta, and few opportunities are available to provide such sites, especially in the southern part of the Island. This site is considered to be a good location for such an activity. Reuse of the site will incorporate tree planting schemes and the provision of facilities for campers, which facilities should be well located so as to be as unobtrusive as possible. It is not envisaged that this will be a commercial project by a private company unless public funding is not available. Although users will be expected to pay for camping, a variable rate should be applied differentiating between voluntary organisations, individual Maltese nationals, and tourists. Linking of the site to the sea will be favourably considered.

## - MA03 Recreational Footpath System

The Planning Authority will promote the development of a recreational footpath system based on routes linking the Hal Far - Delimara and Birzebbuga - Gudja localities. These routes will incorporate picnic areas and strategic planting. The proposed routes are shown on the Policy Map. They will also be the subject of a management scheme. Specific conditions regarding the development of the footpath system will be applied.

A positive feature of the rural hinterland is the quality of the countryside which has considerable recreational potential as yet barely appreciated. The local plan recognises this and the introduction and development of a properly-managed footpath system, with picnic places, is seen as a way of providing simple leisure facilities appealing both to local residents and tourists. The management scheme is necessary to ensure proper upkeep of the footpath system, including any interpretive facilities considered appropriate.

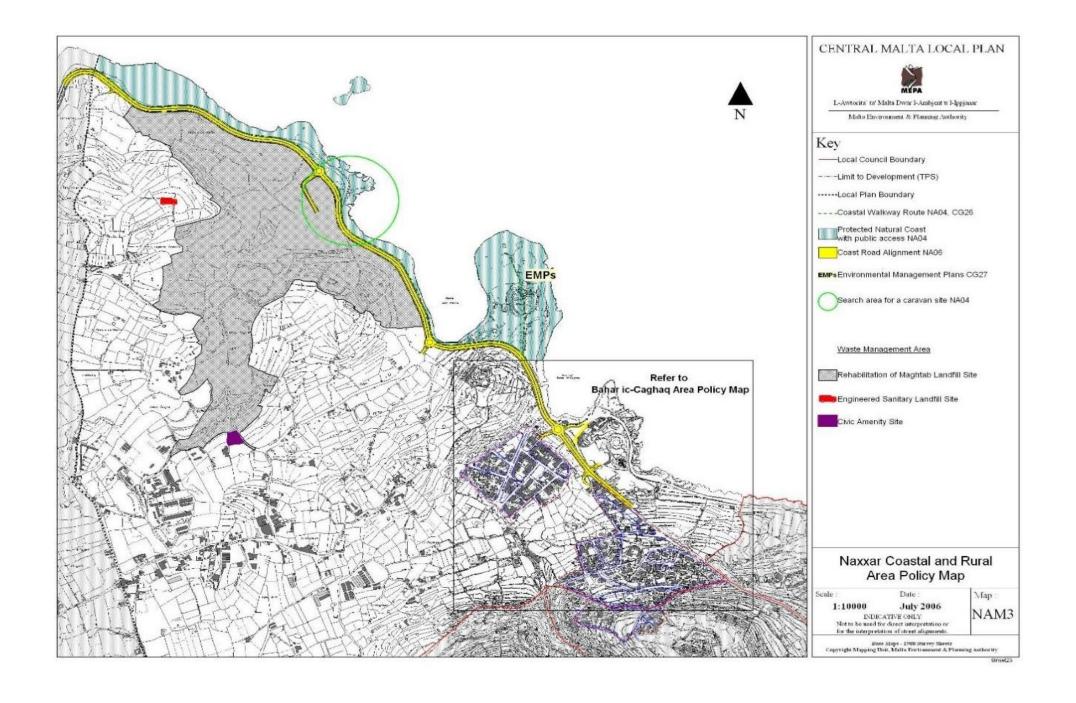
### - ML02 Coastal Footpath

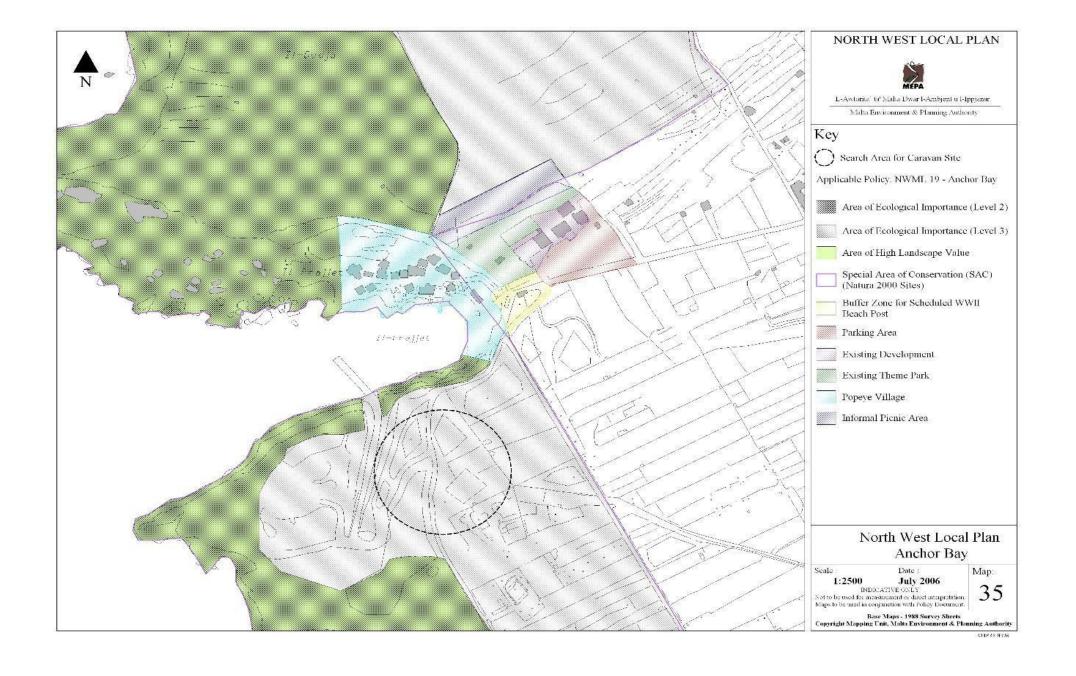
A footpath will be introduced along the coast from Fort St. Lucian to near II-Ponta tal-Qrajten. On the eastern headland of the promontory, a picnic area will be laid out. The Authority will pursue detailed treatment of the settling tank on the seashore.

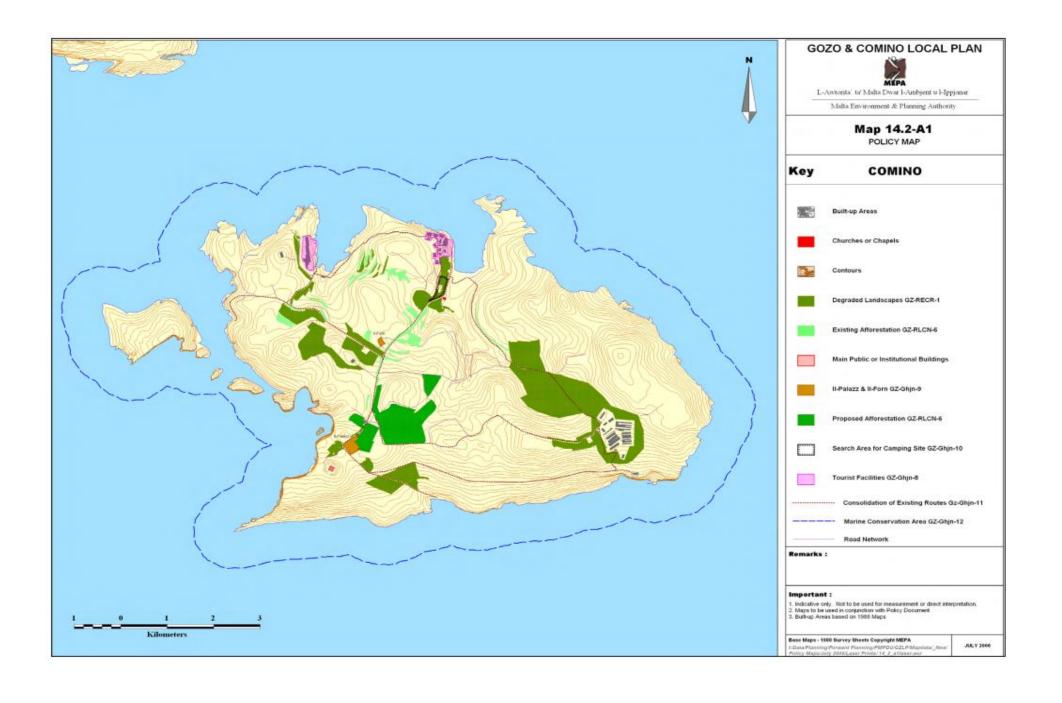
The coastline of the Peninsula presents attractive cliff scenery which cannot be fully appreciated because of access difficulties. The provision of a footpath would help to overcome this problem. Scope also exists for a picnic site to be incorporated into such a route.

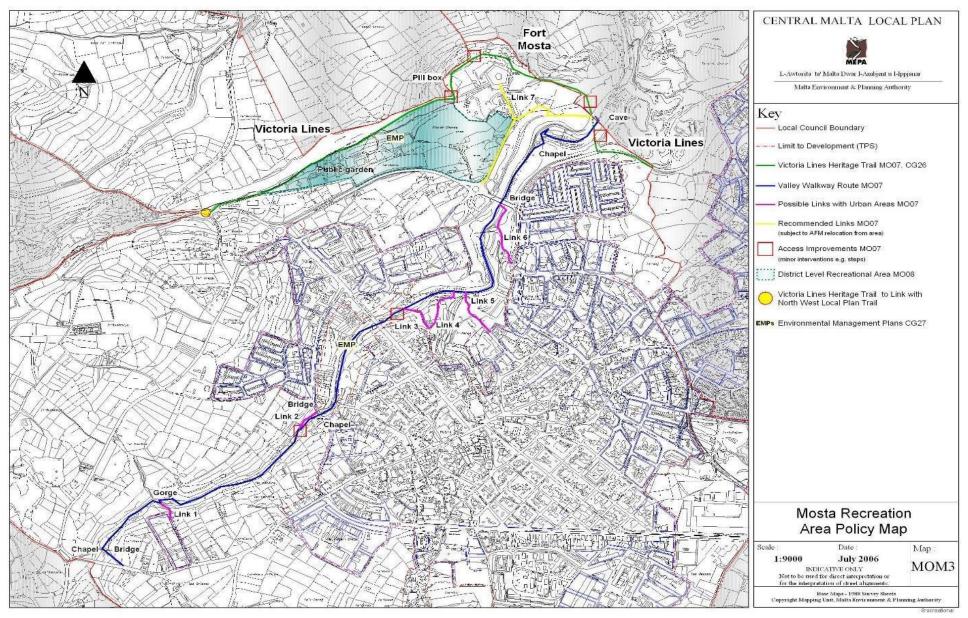
As part of any scheme to attract visitors to the site, the settling tank on the seashore should be treated so as to make it as unobtrusive as possible. This essentially can involve earth moulding, painting and landscaping works. The eventuality of total relocation of the settling tank as part of the overall strategy of relocating of such installations should be investigated. This may be possible in association with other long term proposals to seek the relocation of various oil and gas facilities currently located in or near the area.

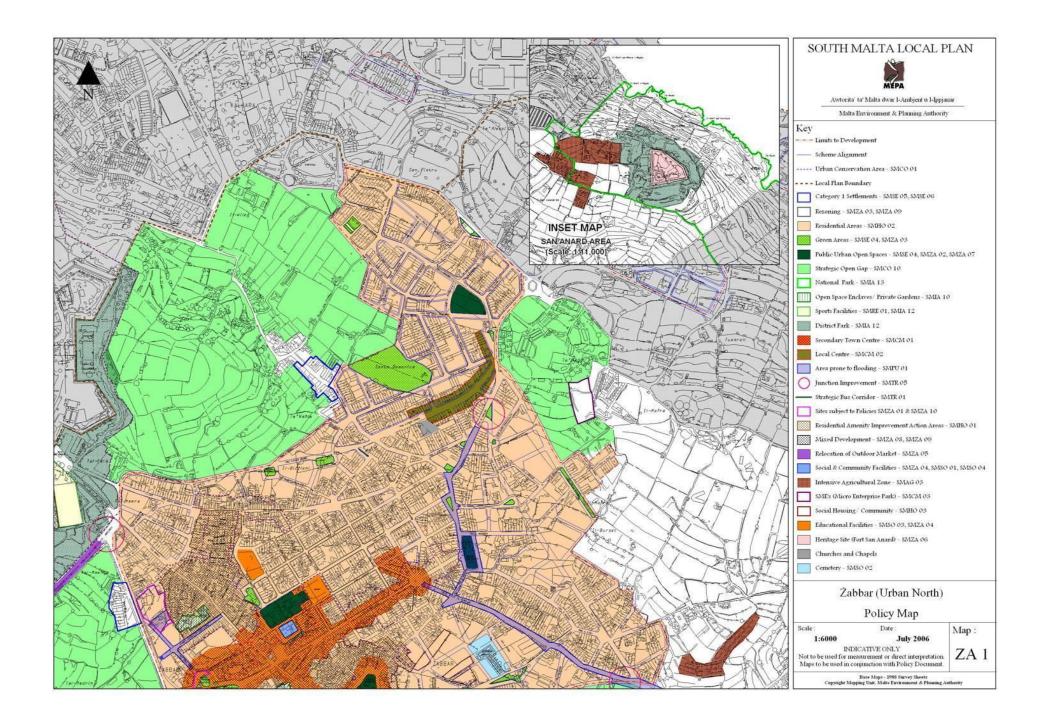
Appendix B: Local Plan Maps for Camping, Caravanning, and Picnicking Areas.

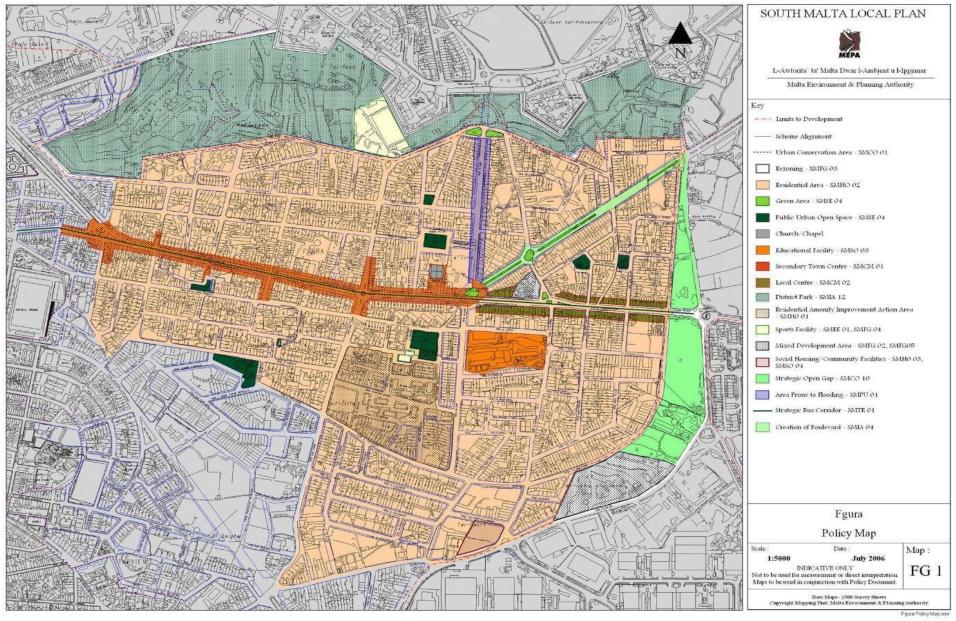












# Appendix C: Existing 'Guidance for Caravan Sites Upgrading' in SMLP 2006

# **Guidelines for Caravan Sites Upgrading in Malta**

#### Introduction

- F.1 The purpose of these guidelines is to explain what the development of a caravan site in Malta involves, site search criteria, model standards, and a brief guidance note relating to maintenance and operation.
- F.2 The guide is intended primarily for developers, operators, their architects, governmental and non-governmental agencies and interested individuals.
- F.3 It also provides a detailed basis for development control and applications for development permission will be evaluated on the criteria set out in this document.

#### Definition

#### Caravan

- F.4 Any structure designed or adapted for human habitation which is capable of being moved from one place to another whether by being towed, or by being transported on a motor vehicle or trailer and any motor vehicle so designed.
- F.5 "Tourers" are those caravans seen on the road being towed by cars. Depending on size and layout, tourers can sleep up to six people because the furniture and fittings in their living and dining areas convert into sleeping accommodation. Facilities that are generally built in or fitted on most models include the furniture, a cooker, fridge, shower with hot and cold water, central heating, toilet and electric light. Power is provided by batteries and transportable gas bottles."
- F.6 "Motor Caravans incorporate the living accommodation of a caravan on a motor vehicle base and are therefore designed specifically for touring. All motor caravans come fitted with furniture and cooking facilities and all but the smallest have toilets, showers, fridges and heaters. Power is provided by batteries and bottled gas and many vehicles provide for mains electricity hook-up when on the caravan park. There are also two more types of motor caravan the van conversion and the coach built".

## **Strategic Planning Context**

- F.7 Caravanning is a recreational activity which is related to the countryside and coastal areas. Structure Plan policies concerning rural and coastal conservation are therefore of particular relevance.
- F.8 Policy RCO 1 designates Rural Conservation Areas and allows for the designation of subareas on the basis of the agricultural, ecological, scientific and archaeological value. Policy RCO 2 prohibits any form of urban development in Rural Conservation Areas but allows "facilities essential to agricultural, ecological, or scenic development" subject to

other Structure Plan policies. RCO 5 prohibits the provision of new or extended infrastructure unless all possible measures to mitigate the visual impact are taken. This is of particular relevance to centralised facilities such as water, drainage, electricity and telephone which are to be provided within caravan sites. (Refer to Explanatory Memorandum Para. 15.34 - 15.41 with respect to AEI's).

- F.9 An important policy is RCO 4 which states that no development of any structure or any activity which in the view of the Malta Environment and Planning Authority would adversely affect scenic value will be permitted.
- F.10 Policy REC 9 prohibits all structures in coastal areas other than tents, windbreaks, and shading devices, used by day visitors. All such temporary structures to be demounted and removed by midnight.
- F.11 The Structure Plan emphasises the need for better regulation of long stay caravanning and camping sites. Policy REC 11 designates sites for overnight accommodations of mobile caravans. Each site to have management and maintenance teams. Regulations are to be introduced to avoid permanent occupancy of any pitch. Permanent residential caravan sites will not be permitted. Policy REC 2 encourages private initiatives for recreation provision in view of limited financial resources likely to be available from government.
- F.12 Policy CZM 2 states that public access around the coastline will be secured. This will include taking shorelines into public ownership.
- F.13 Several other Structure Plan policies provide guidance and, depending on the circumstances of the location of the proposed caravan site, will need to be referred to when an application for a caravan site is submitted. Approved or emerging Local and Action Plans will also need to be referred to as the case may be.

#### Site Search Criteria

- F.14 The following are criteria which will be considered by MEPA when an application for development permission is submitted:
  - a. The site is not located on a scheduled, designated, or protected area including the following:-
    - Areas of Ecological Importance
    - Sites of Scientific Importance
    - Areas or Sites of Archaeological Importance
    - Areas of Agricultural Value
    - Areas of High Landscape Value
    - Nature Reserve
    - Area designated as Public Access Zone
    - Areas specifically designated for protection in a Local Plan or Action Plan.
  - i. The proposed site has adequate accessibility to the local highway network including provision for fire and emergency vehicles;
  - ii. The site is reasonably level with pitch slopes not exceeding 1 in 30;
  - iii. The site is so located that it would not adversely affect scenic such as skyline;

- visually dominate or disrupt its surroundings because of its mass and location or adversely effect existing trees and shrubs;
- iv. MEPA in consultation with the appropriate government agencies, is satisfied that adequate infrastructure is available or can be provided to the site, Schemes for water supply, sewage and refuse disposal shall be submitted and approved with any application; and
- v. The site can be adequately landscaped in order to minimise any adverse visual impacts on the local environment.
- F.15 It is suggested that a caravan site may be appropriately located a short distance inland from the foreshore but not on a designated public access area; adjacent to a national country park or country parkway; or adjacent to an existing recreational area. Given that the major landscape impact of caravans derives from their shape and colour, it is important that proposed locations have some existing trees which would help to mitigate any adverse impact on the local amenity.
- F.16 Developers are strongly advised to consult with MEPA and the Health Division prior to the submission of an application.

### Legal Framework, Procedures and Control of Development

#### **Development Permission**

- F.17 The provision of a Caravan Site will require a development planning permission in accordance with the Development Planning Act, 1992 and subsequent amendments.
- F.18 Any development permission will be subject to an occupancy condition limiting use of the site to an agreed period, (usually of not more than 9 months and individual pitches of not more than 3 months) and a change of use from temporary holiday accommodation to permanent residential use or commercial use, will not be permitted.
- F.19 Applications for development permission or caravan sites will be evaluated on the basis of the criteria set out in this document.

#### Site Licence

- F.20 In addition to obtaining a development permission to construct a caravan site from MEPA, a Site Licence must be obtained from the Health Department. A Site Licence may only be granted after a development permission is obtained, but not before. In applying for a licence the site operator will be required to submit together with the development permit, a management plan dealing with issues such as staffing, opening times, security provision, service, fire regulations, refuse disposal.
- F.21 Before issuing the licence the Health Department in conjunction with MEPA will ensure that the proposed site meets all the requirements set out in these guidelines. The agency may also attach additional conditions if it so wishes.
- F.22 It is important that MEPA and Health Department co-ordinate their works to ensure that the objectives for which caravan sites are designated continue to be met.

- F.23 Once a planning permission is granted, MEPA will be responsible to ensure that no further physical structures are built within the site and that the specific uses are in accordance with the permission. The Health Department will be responsible for issuing the license, will ensure that the caravan site, once operating, is suitably managed and maintained and that all conditions attached to its licence are adhered to.
- F.24 The Health Department reserves the right to withdraw the licence issued to an operator relating to the caravan site if conditions of the licence are not adhered to.
- F.25 If the development permit is withdrawn, the site operator may be required to remove all permanent and temporary structures from the site and restore the site to its original state. If the caravan site is on government land, the Lands Department may wish to terminate the lease and retain all structures on the site and lease the site to another operator.
- F.26 A bank guarantee of at least Lm2000, but not exceeding Lm5000 is to be made by the caravan site operator. The beneficiary is to be MEPA in order that the funds can be used to restore the site should the relevant permit/licence be withdrawn and the caravan site cease to operate.

#### **Temporary Sites**

F.27 Temporary Caravan Sites will not be permitted. MEPA will use its enforcement powers to remove such development and ensure the restoration of the area.

### Site Fragmentation

F.28 The fragmentation of a site by the owner or lease selling or sub leasing one or more plots will not be permitted and a legal agreement between the owner/operator and MEPA will be required. This is to ensure that the whole of the site is available for use by touring caravans. In such cases the site licence will be revoked.

#### **Model Standards**

- F.29 Model standards specify conditions as to the layout and the provision of facilities, services and equipment for sites.
- F.30 The Health Department may, in granting a Site Licence, apply additional conditions to the specific site.

### **Fire Precautions**

F.31 The Health Department shall consult the Civil Protection Department as to the extent to which any specific standards relating to fire precautions are appropriate in relation to each site. Fire points should be established so that no caravan or site building is more than 30m from a fire point.

### Density and Space between caravans

F.32 The minimum spacing distance between adjacent caravans shall be not less than 6m. If awnings are used, the distance between any part of the awning and an adjoining caravan should not be less than 3m, and should not be adjacent to another awning. The density should be consistent with health and safety standards, and also amenity requirements. The gross density should not exceed 40 caravans to the hectare, calculated on the basis of the useable area (i.e. excluding roads, communal services and recreational areas rather than the total site area).

#### Roads

- F.33 Access roads should be of a minimum width of 4m and designed to provide adequate access for fire appliances. The layout of roads shall ensure that no caravan standing is more than 50m from an access road. A one-way circulatory road system, avoiding straight lengths and sharp bends is desirable, with access to pitching areas on both sides. The entrance to the site shall be adjacent to the reception area and under the control of the site warden.
- F.34 Access roads should be suitably surfaced and hard standings such as honey combed concrete blocks provided for each caravan.

# Footpath Network

F.35 A simple easily maintained footpath system should connect pitch location, parking areas, reception office, toilet facilities and recreational areas.

### Reception Office

- F.36 A site reception office, including toilet facilities, storage compound, and caravan pitch for the warden's caravan should be provided. Perishable food may be sold from the reception office, but the predominant use must remain that of reception rather than retail. Adequate parking for caravans to be provided for arrival and departures.
- F.37 An accessible telephone together with a site notice of the address of the site should be available for calling the emergency services.

## Storage of Liquefied Petroleum Gas

F.38 Storage of gas should comply with the appropriate statutory gas regulations.

#### **Electrical Installations**

F.39 Electric hook-ups are to be provided to all pitches with supply cables to be placed at least 500mm below ground level and individual connection points to be no further than 20m from the caravan intake. No overground supplies will be permitted.

#### Drinking water

F.40 An adequate supply of drinking water should be provided. Each pitch should be no further than 50m from a water tap. At each tap there should be a soakaway/gully.

## <u>Drainage</u>, sanitation and washing facilities

- F.41 Provision shall be made for foul drainage, either by connection to a public sewer or by discharge to septic tank or cess pool approved by the Water Services Corporation. Disposal points should also be provided for the contents of chemical closets, with an adequate supply of water for cleaning containers.
- F.42 Toilet blocks to be centrally located to minimise walking distance. Facilities to be based on scaled provision of 1 WC and 1 urinal for males, 2 WCs for women, and 2 washing basins for each sex per 15 pitches. Showers to be provided on the basis of 1 shower for each sex per 20 pitches.
- F.43 Toilet blocks should also provide laundry and dish-washing. A baby/toddler wash room is also desirable, together with facilities for the disabled and wheelchair users.

#### Refuse disposal

F.44 Refuse is to be stored in plastic bags in a refuse skip or container, located in a separate fenced or walled compound near the site entrance.

## **Parking**

F.45 One car only to be parked between adjoining caravans provided that the door to the caravan is not obstructed. Additional space to be provided for visitor parking equivalent to 1 space for every 5 pitches. Visitor parking areas to be sited in convenient locations distributed throughout the site in order to avoid casual parking on site access roads.

### Recreation Space

F.46 At least 10% of the total designated area is to be dedicated to recreation use. The area to be located so as not to cause disturbance to the occupants of nearby pitches. An area for barbecues shall be carefully located in order to avoid inconvenience to other site residents and shall include provision of fire points. A children's' play area should also be provided but only in a sheltered area away from car park access roads.

#### Site Lighting

F.47 Lighting is required for general security, safety and orientation at night-time. Requirements will vary with regard to the character of the site. Normally lighting will be required at reception, toilet blocks and service points. Low-level downlighters and high-level fittings should be used but floodlighting will be prohibited. The lighting layout and light fittings to be such as to minimise light pollution.

# Landscaping

F.48 Landscaping including tree and shrub planting around the caravan pitches is fundamental

for a caravan site to succeed. Trees provide seclusion and privacy and give a greater sense of closeness to nature. In the summer, they provide areas of welcome shade whereas in the shoulder months they act as wind breakers. On planning grounds, trees are required to screen caravans, parked areas and any structures/buildings provided within the site.

F.49 Mature trees greatly enhance the visual aspect of the countryside, and all sites will be required to have a minimum tree coverage of 20% of the total designated site area. Site boundary walling to be constructed in traditional rubble walling and should not exceed 1.2 m in height.

#### **Management Considerations**

- F.50 The success or failure of the caravan site as well as the impact it may have on the local amenity will very much depend on the management of the site. In accordance with Policy NA17 the caravan site operator will be required to submit a management plan with the application for a site licence. The plan is to deal with all matters relating to the efficient running of the site including staffing, facilities, services, operating times, security measures and refuse collection. A site licence will include a number of conditions relating to management which the operator will be required to adhere to.
- F.51 The following is a list of management issues which the camp operator will need to consider carefully before submitting a management plan. It is by no means exhaustive.
  - i. The site operator will be required to keep the site clean and free from the dumping of rubbish. Toilets and facilities are to be kept clean and in good working order. Any damages should be rectified to discourage further damage.
  - ii. The operator should take all necessary measures to ensure that areas surrounding the designated camp site are not affected by litter or dumping resulting from the operation of the site.
  - iii. It is suggested that the site operator provides plastic bags for use by visitors. These sacks are to be secure against scavenging birds or other animals. Similarly, bins should be of the strongest plastic type with lids that can be closed secured. It is essential that a frequent garbage collection service is provided.
  - iv. The firefighting equipment shall be maintained in workable order and be available for regular inspection by the fire authority.
  - v. The site may be operated for a maximum of nine months each year, during which time any member of the public will be able to park a caravan on the site and use the facilities against payment of the relevant fee. The three-month closure period will enable the vegetation to regenerate itself and ensures that the natural ambience of the area is maintained. The months when the site will not operate shall be specified in the site licence.
  - vi. Landscaping within the designated site areas are to be retained and maintained throughout the operation of the caravan site and any trees or shrubs that die or become severely diseased shall be replaced with an equivalent number of the same types of species.

### References

- 1. Guidelines for Designated Camping Sites Planning Authority September 1997
- 2. What is a Caravan National Caravan Council, U.K.
- 3. Background Notes Developing a touring caravan site Caravan Club Ltd., UK.
- 4. Caravan Sites and Control of Development Act 1960 Model Standards, Circular 14/89 Department of the Environment, U.K.