

Coalition for Gozo

Wirt Ghawdex,
Dar il-Gvernatur
Triq l-Imgarr
Rabat VCT 9010,
Għawdex,
Malta



The Coalition for Gozo [made up from *Din l-Art Helwa Għawdex* (VO/0008), *Għawdix* (VO/1152) and *Wirt Għawdex* (VO/0227)] are objecting to the Heritage Impact Assessment (HIA) presented as:

Emmanuel Farrugia, Ggantija Temples WHS Site HIA, Ggantija Temples Heritage Impact Assessment,
and prepared and signed by **Andrew Croft** for

Chris Blandford Associates (CBA) Ltd, www.cbastudios.com

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The said HIA was retrieved from the Planning Authority servers under the document numbers:

2244a - PA_00570_21 - 18205713.pdf,

2244b - PA_00570_21 - 18205714.pdf

2244c - PA_00570_21 - 18205715.pdf

This HIA was put together to justify the construction of the Gigantija Heights apartment block at Triq il-Parsott, Xagħra, Gozo, PA/00570/21 and in the process the demolishing of a vernacular building (see Figs 6 & 7, page 8 this document).

Note on sources. This document uses the official UNESCO/ICCROM/ICOMOS/IUCN 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage Context* as the principal external authority. Direct quotations are taken from the two HIA PDF parts supplied in this chat. UNESCO guidance points are paraphrased and tied to exact page references in Appendix A.

Summary

In the view of the Coalition for Gozo members, this HIA should not be relied upon as a sound basis for decision-making. Although it says it follows the 2022 UNESCO guidance, it applies that guidance too narrowly and too selectively. It gives too little weight to the function of the buffer zone, discounts impacts because they are experienced from within that protected zone, treats design revisions as though they were a proper alternatives exercise, and reaches a reassuring conclusion even though the report itself admits continuing design problems. Most seriously, it treats the demolition of a historic vernacular farmhouse as neutral, even though that building plainly contributes to the character and distinctiveness of the Ggantija buffer zone.

1. The HIA does not properly follow the UNESCO process on screening, scoping and consultation

The UNESCO 2022 guidance says that screening should happen as early as possible; that any proposed action should be examined early to understand whether it is likely to affect the Outstanding Universal Value (OUV) or other heritage values; and that scoping should identify the matters to be assessed, the stakeholders to be involved, the World Heritage property, its buffer zone and wider setting, and the initial alternatives, including the no-project option. A scoping report should then set the Terms of Reference for the full assessment.

| “the scoping and stakeholder consultation requirements fall outside the remit of this HIA”

HIA, Part 1 (2244c), p. 6

| “a new screening and scoping report was not required”

HIA, Part 1 (2244c), pp. 15–16

This is a serious procedural weakness. A fresh HIA for the proposal now before the Planning Authority should not simply assume that UNESCO-style screening and scoping have already been done elsewhere. The report itself confirms that it has not fully undertaken those stages within this HIA.

2. The buffer zone and wider setting are treated too narrowly

The UNESCO guidance requires the baseline and impact assessment to cover the World Heritage property, its buffer zone and its wider setting. It also says that the property cannot be viewed in isolation and that impacts in the whole area of influence must be identified and assessed.

| *“Views to the southeast of the Ġgantija site ... are of principal importance”*

HIA, Part 1 (2244c), p. 32

| *“These views contribute very little in terms of heritage value to the OUV of the WHS”*

HIA, Part 1 (2244c), p. 33

That is too narrow. A UNESCO buffer zone is not there only to preserve one favoured alignment or one ceremonial line of sight. It exists to protect the wider setting in which the site is approached, experienced and understood. The report itself also accepts that Ġgantija gains value from its relatively rural context and setting.

3. The HIA wrongly downplays harm because it is experienced from within the buffer zone

The UNESCO guidance stresses that a World Heritage property is interconnected with its buffer zone and wider setting, and that direct, indirect and cumulative impacts across the entire area of influence need to be assessed. The fact that harm is experienced from within the buffer zone does not reduce its importance.

| *“it is noted however that impact is perceived from within the buffer zone rather than from within the WHS directly”*

HIA, Part 2 (2244b), pp. 47–48

That line reveals one of the report’s clearest methodological flaws. The whole purpose of a buffer zone is to protect the setting around the World Heritage property. Harm within that protected setting is not lesser harm. It is exactly the sort of harm that buffer-zone protection is meant to address.

4. The report admits continuing harm, yet still concludes that the impact is not significant

UNESCO’s guidance expects the assessment to reach clear, dependable conclusions on impact, and it says the final report should recommend that a proposed action should not go ahead if significant impacts on OUV are likely. It also expects alternatives and mitigation to be assessed rigorously, not used loosely to soften an otherwise harmful outcome.

| *“they are still dominant in respect of the townscape streetline they occupy”*

HIA, Part 2 (2244b), pp. 47–48

| *“the proposals still read as a homogenous façade”*

HIA, Part 2 (2244b), p. 92

| *“further work in this regard is required”*

HIA, Part 2 (2244b), p. 92

| *“the mitigated residual minor negative impact of the proposals is not significant”*

HIA, Part 2 (2244b), p. 95

Those statements sit uneasily together. A report cannot fairly say that the scheme remains dominant, still reads as a single homogeneous façade, still needs further work, and then simply conclude that the impact is not significant. That is not a convincing or precautionary chain of reasoning.

5. The alternatives assessment is not a genuine UNESCO alternatives assessment

The UNESCO guidance says alternatives should be identified early enough to influence planning decisions, should include the **no-project option**, and should be assessed with the same degree of rigour as the proposed action. All alternatives should seek to avoid impacts on OUV.

| *“the previous iterations of the scheme ... are considered as Alternative Options”*

HIA, Part 1 (2244c), p. 6

| *“the scheme’s evolution ... fulfils the ToR requirement for outlining Alternative Scenarios”*

HIA, Part 1 (2244c), p. 16

That is not a proper alternatives exercise in UNESCO terms. Different versions of the same development are not the same as testing materially different options, such as a smaller scheme, a lower scheme, a scheme that retains the vernacular building, or the no-development option.

6. The treatment of the vernacular farmhouse is wholly inadequate

The UNESCO guidance explains that OUV is conveyed through attributes, and it also recognises other heritage or conservation values in addition to OUV itself. In a buffer-zone case, one must therefore assess not only the prehistoric monument itself but also the wider historic character that contributes to the distinctiveness of the protected setting.

“the existing building on the site is identified ... as having a degree of heritage value on account of its historic vernacular construction”

HIA, Part 1 (2244c), p. 48

“The principal elevation of the building features shuttered windows within moulded surrounds comprised of cills, lintels, and pilaster strips; this articulation is repeated to the doorcase”

HIA, Part 1 (2244c), pp. 49–50

“the vernacular character of the original fabric has largely been obscured by later accretions, with the exception of the principal façade”

Inventory, Part 2 (2244b), p. 77

“Demolition of existing building on site which comprises a substantially altered historic vernacular property, the original fabric of which probably dates from the C19th ... Neutral”

HIA, Part 2 (2244b), pp. 47–48

This is one of the most troubling parts of the whole report. The building may not be prehistoric, but that is not the point. A vernacular farmhouse only about 180 metres from Ġgantija forms part of the local identity, traditional streetscape and town-edge character that make the buffer zone meaningful. Its total demolition is not neutral. It is an irreversible loss.

7. The HIA underestimates precedent and cumulative erosion

The UNESCO guidance is explicit that a proposal may create a precedent that then creates cumulative impacts in the future. It warns against considering a proposal in isolation and gives examples showing how a series of individually modest changes can become significant over time.

“Repetition of this action within the buffer zones of the WHS sites has the potential to generate negative impacts”

HIA, Part 2 (2244b), pp. 90–92

“Increased urbanisation ... has the risk of being very harmful”

HIA, Part 2 (2244b), pp. 90–92

“sensitive to all geographic points, not simply the alignment to the south-east”

HIA, Part 2 (2244b), p. 92

The report therefore recognises the precedent problem in principle, yet does not apply that warning properly to this proposal. If one vernacular building in the buffer zone can be demolished and replaced by apartments while being classed as neutral, the same logic can be used again and again. That is precisely how cumulative erosion takes place.

8. The HIA relies too heavily on ordinary planning compliance

UNESCO guidance requires the assessment to focus on OUV, attributes, setting, alternatives, mitigation and significance of impact. Ordinary local planning compliance is relevant, but it is not the decisive World Heritage test.

“this policy map predates the 2015 extension to the buffer zone for the Ġgantija site”

HIA, Part 1 (2244c), p. 12

“the proposed development meets the requirements of local and national policy and guidance”

HIA, Part 2 (2244b), p. 95

That should have led to greater caution, not reassurance. A scheme may fit ordinary zoning or local height rules and still be inappropriate in a UNESCO buffer zone if it harms the protected setting and weakens the character that the buffer zone exists to preserve.

9. Monitoring and mitigation are not secured with the clarity UNESCO expects

UNESCO's guidance says that, if a proposal is approved, the impact assessment should identify the conditions and mitigation measures required for approval and explain clearly how they will be implemented and monitored over time. Follow-up is not an afterthought.

| *"Recommendations for monitoring"*

HIA, Part 1 (2244c), p. 7

| *"It is recommended that greater variation in the projections of the sections of the street frontage is explored"*

HIA, Part 2 (2244b), pp. 92-93

| *"With mitigation in place the present minor impact would be reduced to a level that is not significant"*

HIA, Part 2 (2244b), p. 95

The report relies too much on future improvement that is not yet fixed in the proposal itself. UNESCO's approach is stricter: mitigation should be secured, integrated into the scheme, and then evaluated, not simply hoped for.

10. The report gives the appearance of advocacy rather than detached assessment

The UNESCO guidance emphasises transparency, robust review and decision-making that fully considers potential impacts on OUV. In a sensitive case, independence must be demonstrated not just by assertion but by the quality and balance of the reasoning.

| *"provides an independent and impartial analysis of potential impacts arising from the proposed development"*

HIA, Part 1 (2244c), p. 16

| *"This HIA is being undertaken by CBA. It is funded by Emmanuel Farrugia"*

HIA, Part 1 (2244c), pp. 7-8

Funding by an applicant does not automatically invalidate a report. Even so, when the reasoning throughout the document repeatedly narrows the buffer zone, downplays harm, treats demolition as neutral and reaches a reassuring conclusion despite its own negative findings, the report gives the appearance of advocacy rather than detached assessment.

Conclusion

For all these reasons, the Coalition for Gozo members respectfully submit that this HIA is fundamentally flawed and should be given little or no weight by the Planning Authority. It does not apply the 2022 UNESCO guidance with the rigour that guidance requires. It treats the buffer zone too narrowly, discounts impacts because they are experienced from within that protected zone, fails to assess real alternatives, softens cumulative impact, gives inadequate weight to the vernacular farmhouse, and reaches a benign conclusion that is not borne out by its own evidence.

Another major apartment block inside the Ġgantija Buffer Zone, near the Xagħra Circle Hypogeum, has already been put on hold until a Heritage Impact Assessment is carried out. The case in question is PA/07453/24, at Triq tal-Qaċċa, Xagħra, and proposes the demolition of a vernacular farmhouse together with other dwellings, extensive excavation for an underground level, garages and a communal pool, as well as duplexes, a commercial outlet, and additional apartments. The case underlines the intense development pressure being exerted within the Buffer Zone and, at the same time, the need for HIAs that are genuinely rigorous and demonstrably independent.

Should the HIA for Ġgantija Heights be accepted as objective and sound, it is reasonable to expect that the architect behind the Tal-Qaċċa proposal (and other future applications) will submit a comparable assessment and seek the same approval from the authorities.

The long-term implications are deeply disturbing. It could set a ruinous precedent whereby vernacular farmhouses and traditional dwellings within UNESCO buffer zones across Gozo and Malta are routinely sacrificed for redevelopment, gradually enclosing the Megalithic Temples within walls of overbearing apartment blocks and gravely undermining their historic character, dignity, and setting.

The Coalition for Gozo members therefore respectfully request that the Planning Authority require a new, fully independent, genuinely UNESCO-compliant and properly precautionary Heritage Impact Assessment before any decision is taken on this application.

P.S: In some cases, the page numbers in the applicant's HIA were not available, and therefore the Planning Authority's PDF pagination was used instead in this report.

Appendix A – UNESCO 2022 Guidance references relied upon

Official source: UNESCO, ICCROM, ICOMOS and IUCN (2022), *Guidance and Toolkit for Impact Assessments in a World Heritage Context*, Paris: UNESCO.

Ref.	Page / section	Point relied upon in this objection
U1	p. 31, sections 8–11	The report should present impacts on OUV and attributes, recommend alternatives and mitigation, and, if necessary, recommend that the proposed action should not go ahead if impacts on OUV are likely to be significant.
U2	p. 35, section 6.4	Screening should happen as early as possible. Any proposed action should be examined early to understand whether it is likely to affect OUV or other heritage/conservation values.
U3	pp. 37–38, section 6.5 and Table 6.1	Scoping should identify the issues to be assessed, the World Heritage property, its buffer zone and wider setting, the stakeholders to be involved, and initial alternatives, including the no-project option. The scoping report should set the Terms of Reference.
U4	pp. 42–43, section 6.7.2	Alternatives should be identified early enough to influence decisions; all alternatives should seek to avoid impacts on OUV; reasonable alternatives should be assessed and compared using the same rigour as the proposed action.
U5	pp. 44–45, sections 6.8.1–6.8.2	A proposal may create a precedent and cumulative impacts in the future. The property should not be viewed in isolation, because it is interconnected with its buffer zone and wider setting.
U6	p. 52, section 6.14	If approved, mitigation measures should form part of a clear implementation strategy and should be implemented and monitored over time.
U7	pp. 56 and 61	Baseline monitoring, compliance monitoring and management follow-up should be clear. Attributes of OUV are treated as valued environmental components in the impact assessment process.
U8	p. 60, Glossary	The guidance recognises other heritage or conservation values in addition to OUV. These can include historic, aesthetic, social or other values that still matter in decision-making.
U9	p. 64, Glossary	The precautionary principle applies where the stakes are high and scientific certainty is incomplete. Lack of full certainty is not a reason to postpone protective action.

Appendix B – Direct quotations from the supplied HIA PDFs

The quotations below are the key passages from the supplied HIA documents on which the critique above relies.

Source	Page(s)	Quoted wording
2244c – Part 1 of HIA	p. 6	“the scoping and stakeholder consultation requirements fall outside the remit of this HIA”
2244c – Part 1 of HIA	pp. 15–16	“a new screening and scoping report was not required”
2244c – Part 1 of HIA	p. 32	“Views to the southeast of the Ġgantija site ... are of principal importance”
2244c – Part 1 of HIA	p. 33	“These views contribute very little in terms of heritage value to the OUV of the WHS”
2244b – Part 2 of HIA	pp. 47–48	“it is noted however that impact is perceived from within the buffer zone rather than from within the WHS directly”
2244b – Part 2 of HIA	pp. 47–48	“they are still dominant in respect of the townscape streetline they occupy”
2244b – Part 2 of HIA	p. 92	“the proposals still read as a homogenous façade”
2244b – Part 2 of HIA	p. 92	“further work in this regard is required”
2244b – Part 2 of HIA	p. 95	“the mitigated residual minor negative impact of the proposals is not significant”
2244c – Part 1 of HIA	p. 6	“the previous iterations of the scheme ... are considered as Alternative Options”
2244c – Part 1 of HIA	p. 16	“the scheme’s evolution ... fulfils the ToR requirement for outlining Alternative Scenarios”
2244c – Part 1 of HIA	p. 48	“having a degree of heritage value on account of its historic vernacular construction”
2244c – Part 1 of HIA	pp. 49–50	“The principal elevation of the building features shuttered windows within moulded surrounds comprised of cills, lintels, and pilaster strips; this articulation is repeated to the doorcase”
2244b – Inventory appendix	p. 77	“the vernacular character of the original fabric has largely been obscured by later accretions, with the exception of the principal façade”
2244b – Part 2 of HIA	pp. 47–48	“Demolition of existing building on site which comprises a substantially altered historic vernacular property, the original fabric of which probably dates from the C19th ... Neutral”
2244b – Part 2 of HIA	pp. 90–92	“Repetition of this action within the buffer zones of the WHS sites has the potential to generate negative impacts”
2244b – Part 2 of HIA	pp. 90–92	“Increased urbanisation ... has the risk of being very harmful”
2244b – Part 2 of HIA	p. 92	“sensitive to all geographic points, not simply the alignment to the south-east”
2244c – Part 1 of HIA	p. 12	“this policy map predates the 2015 extension to the buffer zone for the Ġgantija site”
2244b – Part 2 of HIA	p. 95	“the proposed development meets the requirements of local and national policy and guidance”
2244c – Part 1 of HIA	p. 16	“provides an independent and impartial analysis of potential impacts arising from the proposed development”
2244c – Part 1 of HIA	pp. 7–8	“This HIA is being undertaken by CBA. It is funded by Emmanuel Farrugia”

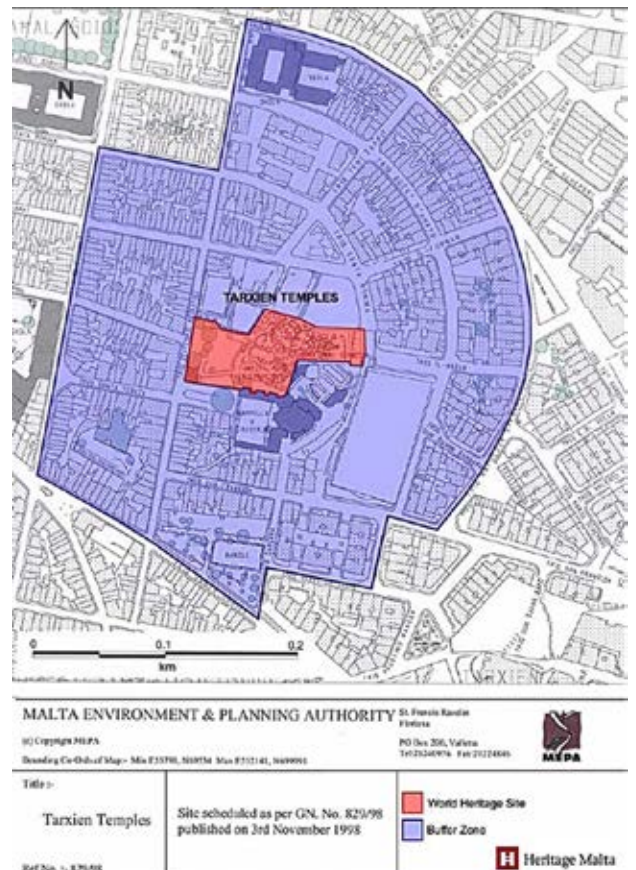
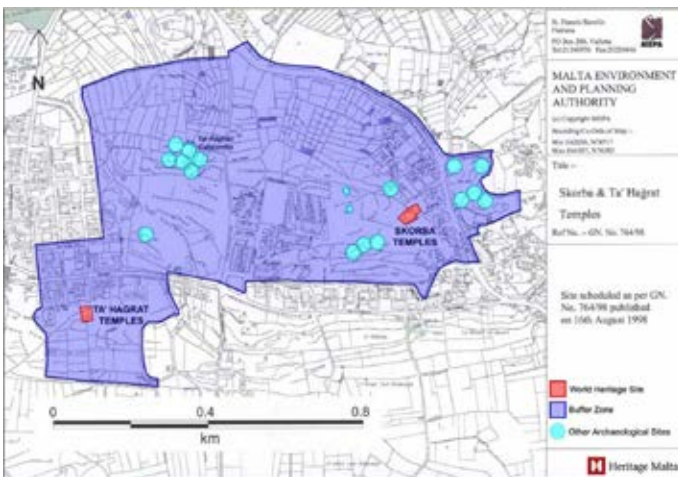
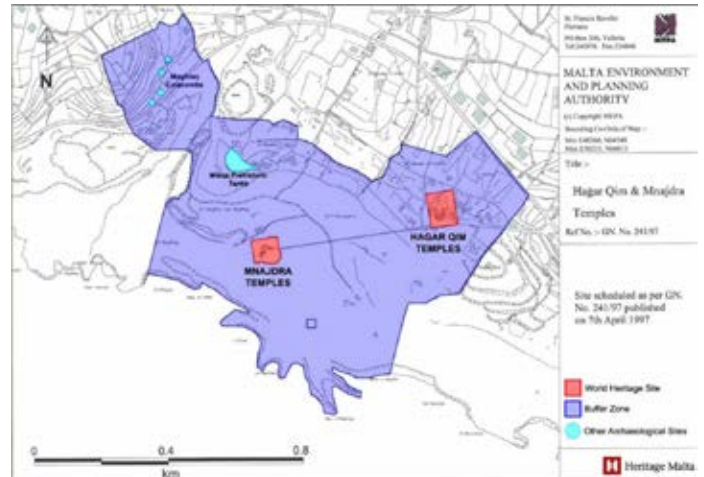
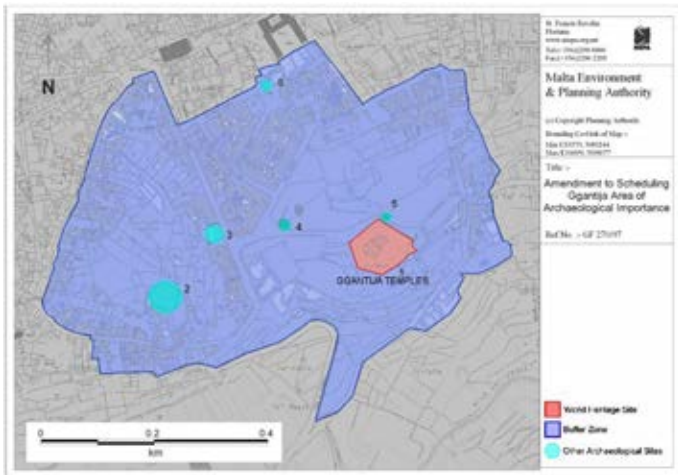
Appendix C – Source list

UNESCO, ICCROM, ICOMOS and IUCN (2022), Guidance and Toolkit for Impact Assessments in a World Heritage Context, Paris: UNESCO. Official World Heritage Centre publication.

2244c – PA_00570_21 – 18205715.pdf. Supplied HIA PDF, cited in this document as Part 1 of the Heritage Impact Assessment.

2244b – PA_00570_21 – 18205714.pdf. Supplied HIA PDF, cited in this document as Part 2 of the Heritage Impact Assessment, including appendices and source list.

Figures 1- 5. Megalithic Temples of Malta buffer zones.



ID	Name	State Party	Coordinates	Property	Buffer Zone
132ter-001	Ggantija Temples	Malta	N36 2 56.51 E14 16 3.91	0.715 ha	33 ha
132ter-002	Hagar Qim	Malta	N35 49 40.18 E14 26 30.44	0.813 ha	63 ha
132ter-003	Mnajdra	Malta	N35 49 36.26 E14 26 12.38	0.563 ha	
132ter-004	Ta' Hagrat	Malta	N35 55 7.08 E14 22 7.32	0.154 ha	60 ha
132ter-005	Skorba	Malta	N35 55 15.45 E14 22 39.96	0.103 ha	
132ter-006	Tarxien	Malta	N35 52 9.49 E14 30 43.96	0.807 ha	11 ha



Figure 6. The vernacular farmhouse earmarked for demolition lies in close proximity to the Ġgantija Temples.

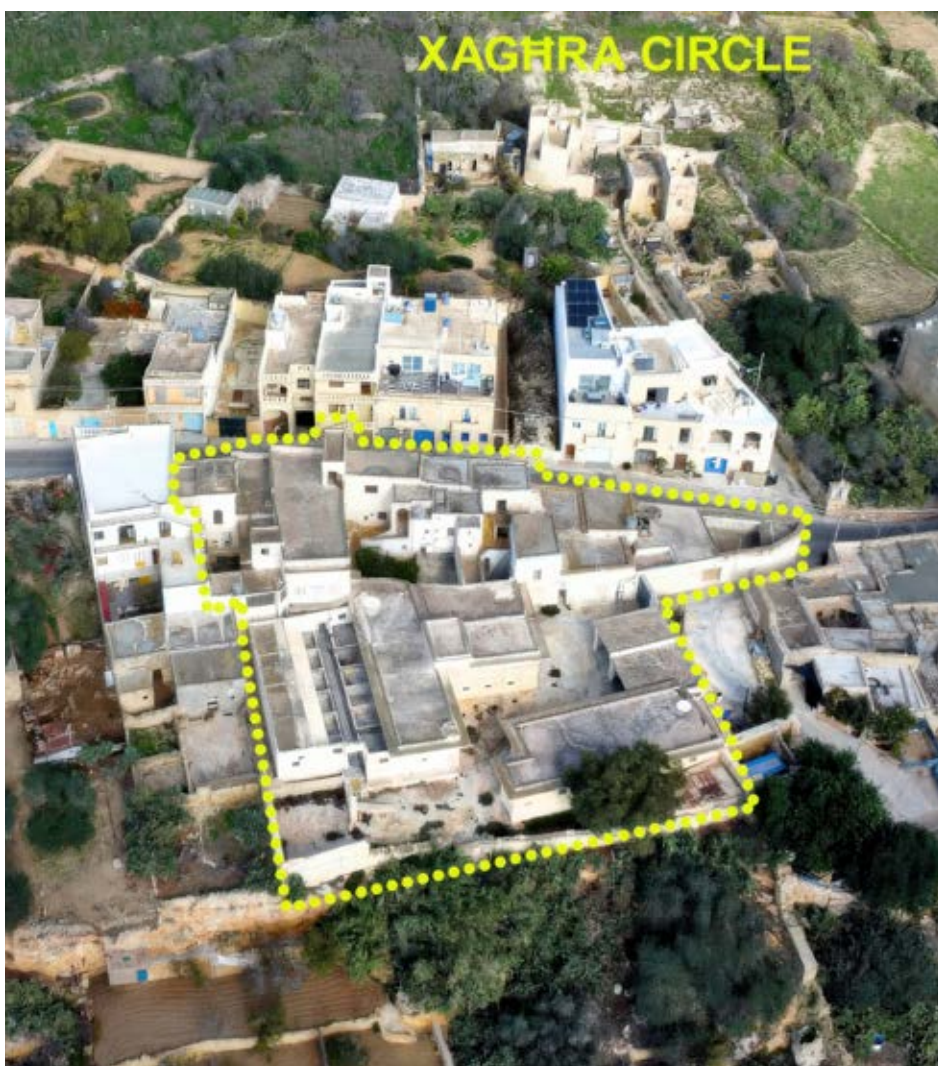
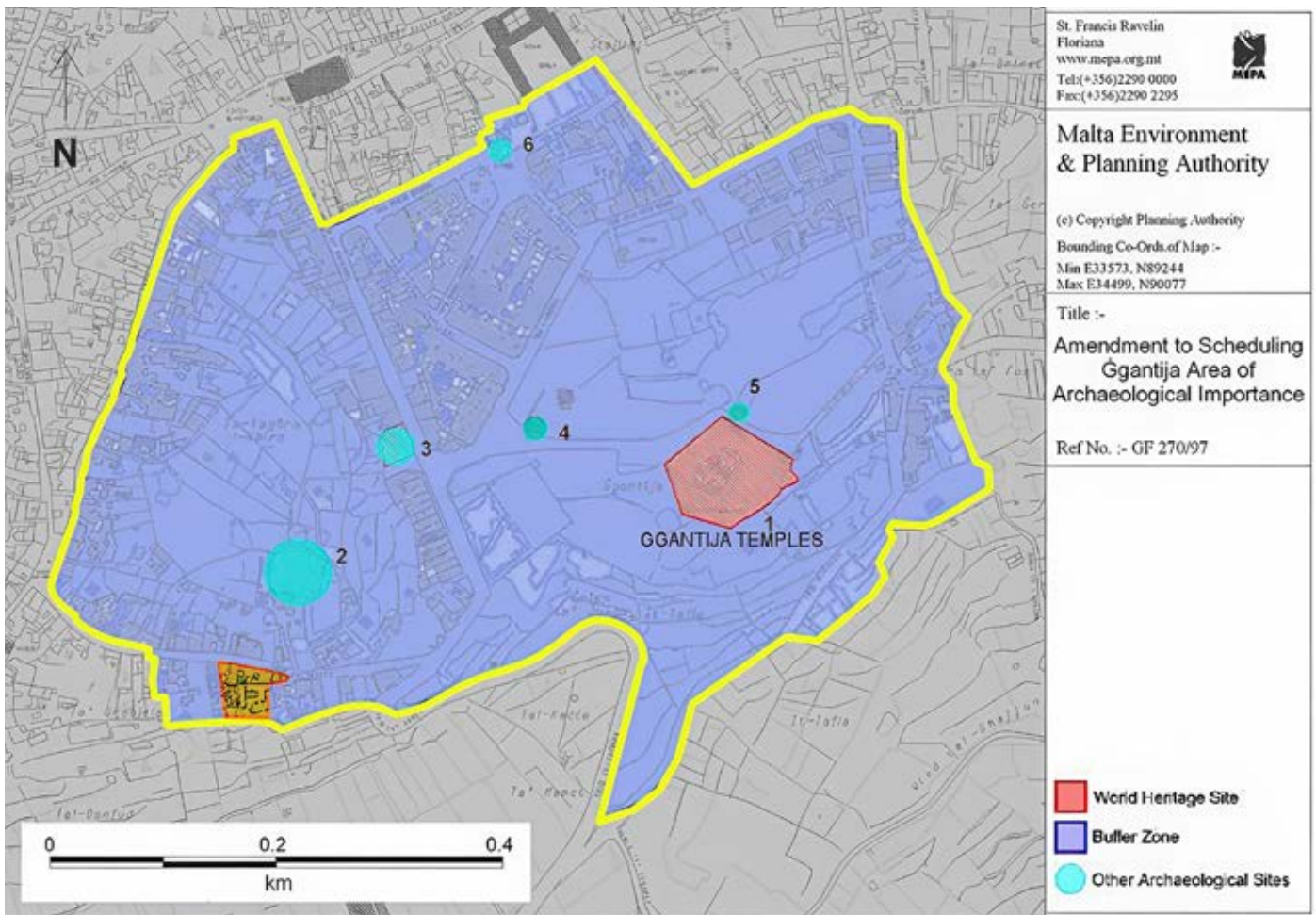


Figure 7. The vernacular farmhouse that is to be demolished to make way for the new development. Parts of the building are of considerable age, as rubble masonry was used in its construction (see IHA 2244c, page 52 (page 62 of 85 of the PDF), Plate 16. The farmhouse incorporates above-ground and underground water reservoirs, living quarters and animal sheds within the same structure.



Figures 8 a & b. Screenshots from Planning Authority MapServer, showing extent of WHS (inner blue polygon); a past (superseded) buffer zone tied to national legislation (large blue circle); the officially recognised World Heritage Site Buffer Zone (outer blue perimeter); the Development Zone Boundary (red line) and the site which is the subject of the HIA (light blue shading with dashed boundary). Note that there are several other sites in the same zone, which are likely to follow the precedent of whatever is decided for this application. Red bold lines (below) are indicative of Stop and Enforcement Notices.





Figures 9 & 10:
Application N° PA/07453/24
Proposed demolition of existing structures and excavation for one basement level. Proposed to include 13 garages and a communal pool at basement level (-1), 8 duplex apartments at levels -1 and 0, a class 4b commercial unit at level 0, 3 dwellings, 8 apartments at level 1, and 8 apartments at level 2.
Location: 39,40,40A, Triq tal-Qacca, Xaghra, Gozo.

This major development, within the UNESCO Ġgantija Buffer Zone and in close proximity to the Xaghra Circle Hypogeum, has been suspended pending a Heritage Impact Assessment requested by the Coalition for Gozo's representative, after the Superintendence of Cultural Heritage failed to require one during the Planning Authority board meeting.