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22nd April, 2019

The Secretary
EPRT
St. Francis Ravelin,
Floriana

Re: Proposed sanctioning of existing stables and ancillary facilities. Application includes additional installation of 2 stables and planting of vegetation. – PA 8049/18

Reference is made to the refusal dated 15th March, 2019 and issued in connection with the above mentioned application.

We would like to appeal against the refusal of development permission for the following reasons:

With reference to reason for refusal 2, it is to be pointed out that the current application is an overall positive improvement over the original submission PA 4750/16 (Appeal PAB 251/17) in that we are proposing the complete replacement of grass blocks, concrete areas and passageways by compacted soil. We do not intend to sanction the existing situation but intend to replace the existing cover. Hence the reason for refusal is very unclear.

Reason for refusal 3 can be addressed through a revision of the submitted drawings if the EPRT deems appropriate.

With reference to reason for refusal 5, it is to be noted that the agricultural store does not form part of this application as it already exists and is not being sanctioned. It is already provided by an electricity meter (refer to CMP 64652).

With reference to reason for refusal 1, substantial changes have been done to the previously refused application in order to minimise the impact of the proposal. Size of paved areas, paved passageways and paddock areas have been reduced drastically to try to reach an acceptable compromise.

The stables for which sanctioning is being requested have been imported as demountable structures which incorporate an enclosed space together with a cantilevered suspended canopy. One should therefore expect that when considering areas, only the area of the enclosed stable should be taken in consideration. Consequently, the total floor area covered by structures should be taken as follows:

Quarantine Stable and ancillary room	_____	25 m ²
Stables (4 in no.)	_____	48 m ²
Fodder Store	_____	49 m ²
Tool Room	_____	4.6 m ²
Manure Clamp	_____	27 m ²
		<u>153.6 m²</u>

The EPRT should here keep in mind that the application intends to sanction the structures which exist on site and which have been present prior to the advent of the RPDG Policies. Considering that, as per RPDG Policy 5.2, the applicant is entitled to a total built up area of 125m² and that the manure clamp by itself covers 27m², the excess area over that allowed by the policy should not in this case be a contributory factor which decides the negative fate of this application.

In view of the above, we respectfully request the EPRT to consider our proposal, suggest possible changes and/or mitigations and eventually issue the relevant permits.

Kindly acknowledge receipt of this correspondence.

Regards,



J Grech A&CE