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The Planning Commission
Planning Authority
St. Francis Ravellin,
Floriana



Application Number: PA/02735/20

Location: Site at (Garage), Triq Ghajn Tuta, Kercem

Proposal: To construct a sheep farm.

In in terms of Article 13 of the Environment and Planning Review Tribunal Act, 2016 we hereby submit our request for appeals before the Environment and Planning Review Tribunal

Reason 1

The proposed new livestock farm within close proximity to the development zone runs counter to Thematic Objective 6.1 of the Strategic Plan for Environment & Development, which aims to safeguard environmental health from air and noise pollution by controlling the location, design and operation of development

Argument 1

The Local Plan Interpretation Document has specifically dealt with these instances and it has given the general direction that "inhabited areas" will only be applicable to areas within the Development Boundaries (and therefore will **not** apply to ODZ Settlements, Areas of Containment, small clusters of dwellings or single dwellings which lie ODZ), furthermore the site is located adjacent to the applicant's residence, this will provide a buffer zone from the area that is located within the development boundaries. To put everything into context the applicant is registered with VRD as a small ruminant breeder and has no intention of rearing more than 4 sheep at one time, the cheese

production will be very limited and will not be carried out as a commercial activity but simply as a pass-time and a hobby. This will greatly reduce the impact the small farm might have on the residential element in the area. Finally we make reference to PA 5277/17 an application which is very similar in nature to the one under consideration, this Planning Application was granted on the bases that a small ruminant breeder will unlike have an adverse impact on the residential properties within the area.

Reason 2

The proposed development runs counter to the provisions of policy 2.3B of the Rural Policy & Design Guidance (RPDG) 2014 in that no clearances were obtained from the AAC and ERA (criterion 1). The proposal is therefore not in line with the Thematic Objective 1 of the Strategic Plan for Environment & Development and policy GZ-SETL-2 of the Gozo & Comino Local Plan (Strategic Open Gaps) for limiting the land take up for uses which are not necessary or legitimate in rural areas. Hence, the proposal also runs counter to Rural Objectives 1, 3, and 4 to facilitate sustainable rural development by controlling the location and design of rural development, as well as the cumulative effect of such development

Argument 2

Thematic Objective 1 of the Strategic Plan for Environment & Development and policy GZ-SETL-2 of the Gozo & Comino Local Plan allows for the construction of structures which are intrinsically related to agricultural use this includes animal husbandry, the DPA report fails to specify the reason why AAC clearance was not obtained and failed to contact our office to request the details the AAC had requested and opted to include the issue as a reason for refusal. We respectfully request the Planning Commission to consider the plans being submitted with this reply to address all the issues flagged by the AAC.