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Director of Planning  
 Planning Directorate  
 Malta Planning Authority  
 Floriana



08 October 2021

Application Number: PA/07366/20

Location: Site at, Triq Hal Qormi, Luqa

Proposal: To construct a car-wash facility (Class 5A) in relation to an existing car service and repair center including a Class 4B shop and electrical vehicle charging stations

In terms of Article 13 of the Environment and Planning Review Tribunal Act, 2016

#### Counter Argument

The applicant is the owner of a car repair centre Andrew's Car Centre just across the road from the proposed application and Freemond LTD is local representative of Sixt Car Hire an internationally renowned brand for car hire, the rationale behind this application is to provide a one stop shop for the company to start to expand in the provision of electric cars to their customers in Malta. The current setup is that all repairs on the sixth fleet is carried out by Andrews Car Centre and after that the cars are transported to another location to be cleaned and made ready for another customer, this is creating a situation where these vehicles are moved from site to site to be services, repaired and cleaned. The purpose of this application is to provide a one stop shop for the company where the cars are services and repaired in the car centre covered by PA 134/93 and the charged and cleaned ready for the next customer order for the Malta National Airport a few kilometres away from the site.

This application was submitted after another application with similar proposed use and area (applicant's site is 2500 sqm and PA 6211/16 has an area of 2,100 sqm) since the sites are just 80m away from each other. Given the similarity of the cases we have gone through both case officer's report to provide an analogy of both cases which have been treated very differently even though they are intrinsically very similar

AAC min 85A in PA 6211/16 "the committee has no remit on the application since the proposal is related to an Industrial use"

AAC min 62A in PA 7366/20 "the committee object in principal since the proposed development is not related to agriculture.  
Completely opposite approaches to similar applications

SCH min 66 in PA 6211/16 "the SCH objects to the canopy and the photovoltaic panels" the SCH objects to the solar panels and completely overlooks the fact that the site is ODZ

TM - No objection

Transport Planning Unit min 81 - No objection

REWS "the case does not fall within the remits of the REWS"

WSC "No Objection"

After this the case gets more interesting the Directorate in the DPA report is making an argument that the site is not to be considered as ODZ since it is covered by PB 3363/89 it is to be note that PA 3363/89 was not issued for any Industrial use but solely for the construction of a 1.05m boundary wall this is confirmed by PA 3634/94 which requested the sanctioning of the boundary wall which was not constructed as approved, the application was refused and EC675/93 was issued on site then the DPA report in PA 6211/16 goes on to state that since the original application was proposed as an industrial garage even though the garage was removed from the plans following a court order and the permit issued solely for the 1.05m boundary wall that the site is committed for Industrial Use if since this argument was considered to be valid by the Planning Appeals Board Appell 328/17, then the same principle should be applied in our case since the area is committed to an industrial/commercial use and confirmed by PA 6211/16 and also by the LIDIL car park a few meters up the road.

This proposed development is in line with the government's policy Electromobility Action Plan which sets up a target of providing over 500

charging stations nation wide, this application will greatly help to achieve this ambitious target.

Regards,

Simon Spiteri

OBO Perit Censu Galea.

