

PA 14

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8th January 2018

Attn : The Environmental and Planning Review Tribunal
St. Francis Ravelin
Florina

Re. PA6440/17 – Munxar, Gozo
This is an appeal against refusal

ENVIRONMENTAL AND PLANNING
REVIEW TRIBUNAL
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Fig. 01 ; Existing state of Slaughter house

Reference is made to the DPA report prepared by the Planning directorate and subsequent decision notice with a refusal for the proposed development on the basis that :

1. The proposed footprint is larger than the legally existing footprint
2. The proposal does not have a wider environmental benefit
3. The landscaping is not considered adequate
4. The proposal goes counter to SPED policies.

On behalf of my client I wish to put forward the following comments and information for the board's consideration.

1. Legally existing / proposed footprint

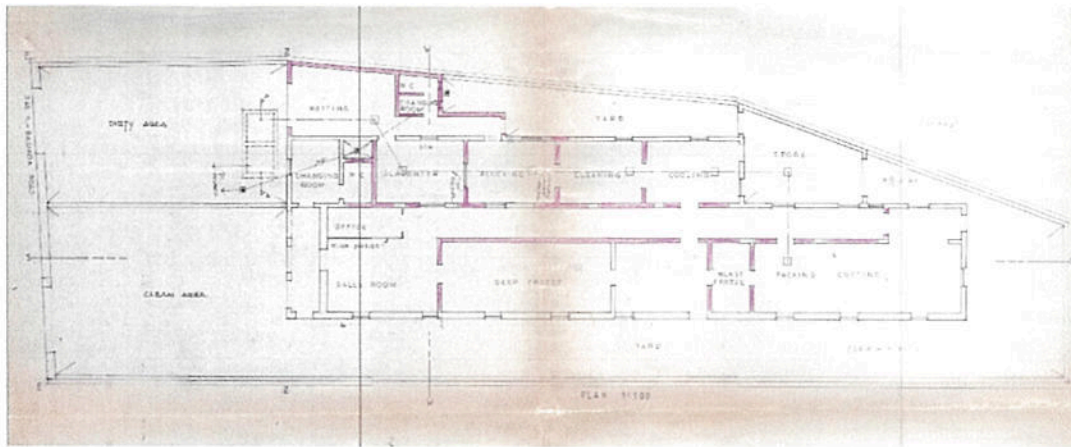


Fig 02 Approved Layout PA3357/97

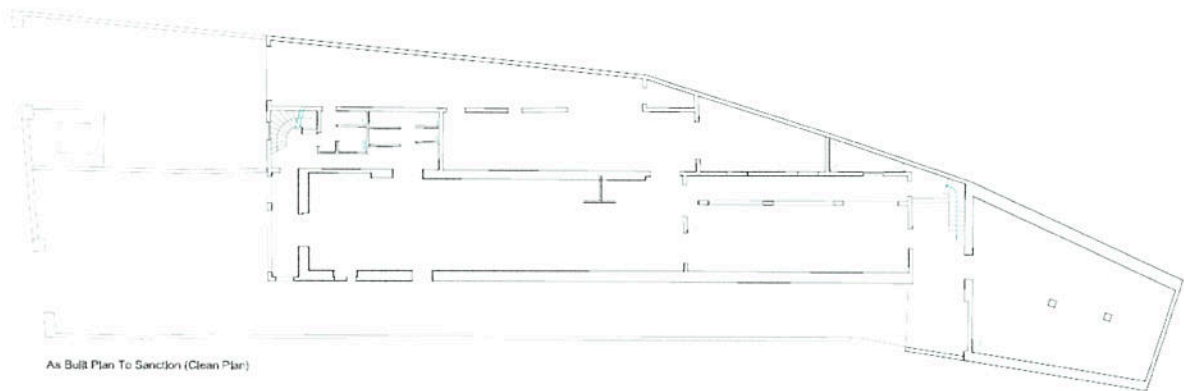


Fig 03 Existing Ground floor layout (As built)

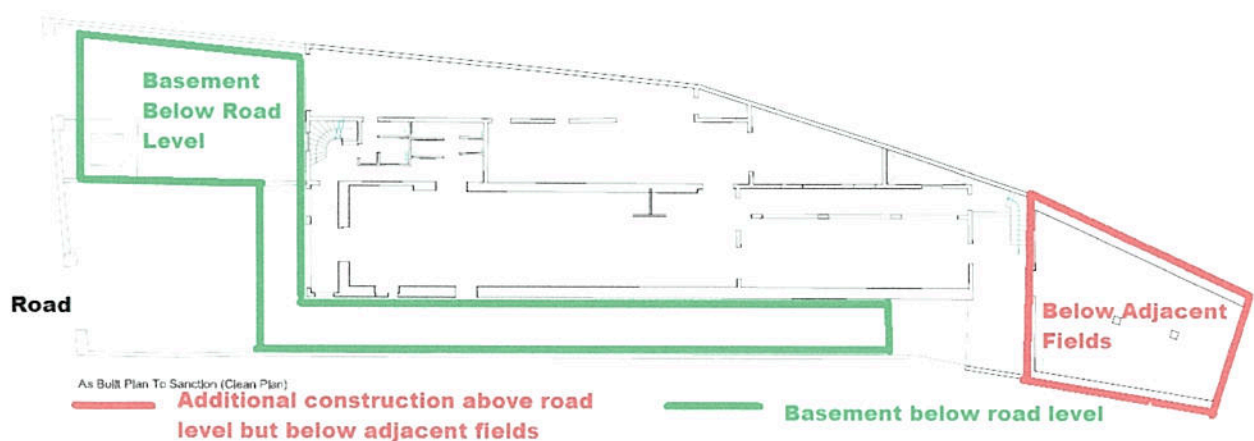


Fig 04 Existing Ground floor layout (showing the developed differences)

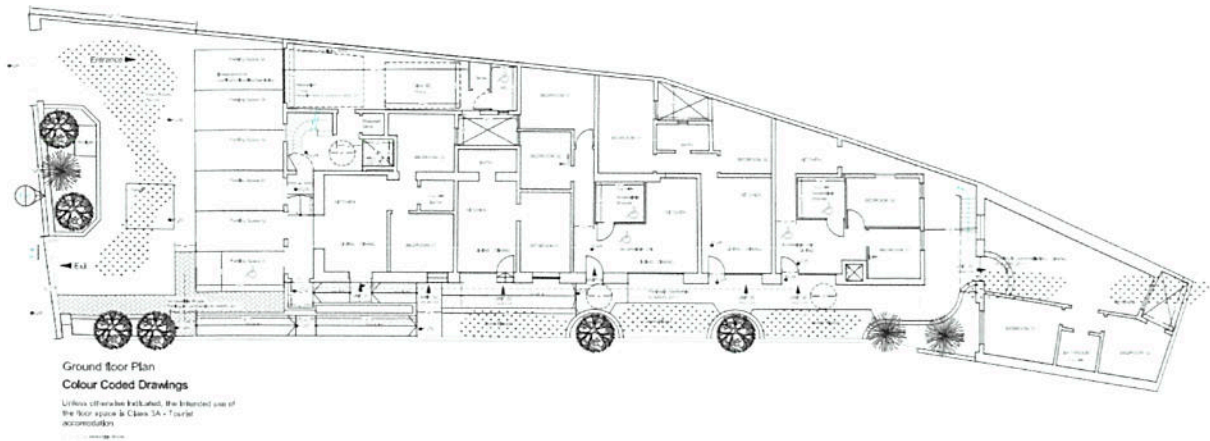


Fig 05 : Proposed Ground floor plan – Touristic accommodation

The planning directorate is stating that the building foot print is being increased at ground floor level. Reference to figures 02-05 above, the additional floor space / footprint comprises the roofing over of yards within the approved building footprint (this is normally considered as part of the developable footprint) and the conversion of an agricultural store constructed pre-1992 (But not figuring in PA3357/97) which is largely hidden below ground due to the stepping of adjoining fields (Fig. 06)

There is also additional basement space below road level that is being proposed for sanctioning.

Since the additional floor space requested for sanctioning is not visible from road level and is generally below adjoining site levels, our proposal was to incorporate them within the proposed scheme as these spaces would give added value to the development. If the planning commission does not share our opinion, we have no objection to reverting our request and instead remove such structures bringing the floor space strictly to that approved in PA3357/97.



Fig 06 : Rear view of Pre-1992 agricultural store.

2. Wider environmental benefit

Contrary to the statements of the directorate, we believe that there is a significant environmental benefit in the proposed change of use as touristic accommodation. Whilst the building was originally conceived with the intended use for the breeding of livestock, the destined use of the site changed through the approval of PA 3357/97 where the building was turned into a slaughter house. This is an industrial activity that does not necessarily need to be located in an ODZ setting and has an invariable negative impact on the environment. Surely, the proposed change of use would entail a quality leap for the site and the area in general when compared to the existing permissible industrial use of the site. One just needs to imagine the sights, sounds and smells of trucks, vans and other vehicles laden with cargo and animals entering and exiting the site; whilst comparing it to the quaint setting of a rural touristic accommodation. Furthermore, the building would require an essential uplift before being put to the new use. Were the industrial activity to resume on site, such uplift would not be essential for the industrial operation and the site would remain in its current unsightly form.

3. Landscaping

Following consultation with the planning directorate, fresh plans (92c) with an improved landscaping scheme were submitted comprising endemic and traditional tree species, and grass blocks as floor paving were possible to limit the hard paved areas and reduce the site formalization. We are obviously willing to improve further on the landscaping scheme if this is required/requested.

4. SPED Policies

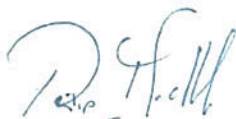
The directorate contends that the proposal goes against SPED policies which aim to protect the landscape and the traditional components of the rural landscape. Surely one cannot but take into account that :

- a. There is an existing committed use on site (slaughter house) that is by far a negative impact on the immediate surrounding environment. The proposed use would surely be an improvement to the existing situation and hence there is a wider environmental benefit through this proposal.
- b. SPED Gozo Objective 1, Point 2, identifies Xlendi as a business hub for tourism and leisure related activities. The site is within this same locality and the proposed development would provide for an alternative product to the discerning tourist. Hence the proposed use compliments the SPED strategy

We reserve the right for the submission of further evidence and information.

Both architect and applicant wish to be present for the Tribunal board hearing.

Yours Faithfully,



PHILIP MICALLEF A.&C.E.