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The Hon Chairman,  
Environment and Planning Review Tribunal  
Block B, St. Francis Ditch,  
Floriana



Application Number: PA/06782/19  
Location: Site at, Triq il-Qortin, Nadur  
Proposal: To sanction the use of the site as boat storage for the winter period (Class 6A) and also sanction the construction of a tented structure on the same site

12 November 2020

In terms of Article 13 of the Environment and Planning Review Tribunal Act, 2016, we herby submit our arguments for appeals.

The reasons are based on two arguments,

Argument 1

The proposed boatyard to be sanctioned is not considered essential to the needs of agriculture, running counter to Thematic Objectives 1.1, 6 and 8, and to Rural Objectives 1.1, 3 & 4 of the Strategic Plan for Environment and Development (SPED), which requires sustainable rural development and diversification of activities within the Rural Area to sustain agriculture and safeguard its distinctiveness by protecting good quality agricultural land

from development. The proposed development runs also counter to the provisions of policy GZ-SETL-2 of the Gozo and Comino Local Plan which specifies that MEPA will not permit any urban development in designated Strategic Open Space Gaps.

#### Counter Argument 1

The site was part of an existing licensed pig farm which over the years got scaled down due to the lack of business relating to pig meat production and the area was never covered in soil as it was used as an open paddock and was always beaten earth. The nature of the site was never altered by my client. The site is only used to park/store boats on site which are placed on movable trailers and therefore the impact on the land is very very minimal apart from this the land is left free of any vehicles for most of the year since the boats normally spend from March till September at sea, we fail to understand the rationale behind the reasons for refusal

#### Argument 2

The proposed development runs counter to the provisions of policy 1.2D of the Rural Policy & Design Guidance (RPDG) 2014 in that it fails to promote soil conservation.

#### Counter Argument 2

This argument ties to the previous argument, the Planning Authority is not correct that there was any soil sealing on site since the site was part of a pig

farm and was always beaten earth and no soil sealing has ever taking place  
on site.

Regards,

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