

Josette Vella

From: Astrid Vella <astridvella@faa.org.mt>
Sent: 27 August 2021 11:57
To: EPRT Info
Subject: [Ext] Appeal against PA3000/19

[EXTERNAL]

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Dear Sir/Madam,

FAA formally notifies the EPRT that it is hereby appealing the PA decision on PA 3000/19, for the reasons listed below and others that it shall forward shortly.

This project involves the taking up of agricultural land to widen a road for no reason other than to add a series of services that are not required on a road that is rarely congested, it runs counter to the **Gozo and Comino Local Plan Map 11.2** which designates much of the land on either side of the road as Land of Agricultural value. This road widening project, on an island that, according to the SPED "shall become an ecological island" runs counter to the document's intentions to "protect the Gozitan lifestyle, the island's environment, resources, and ensure that these play a significant part in attracting more visitors to and investors to the island."

The proposed cycle lanes are not continuous and do not justify this damaging project. Straightening and widening this road will encourage drivers to speed, thereby endangering cyclists.

The unwarranted take-up of ODZ agricultural land runs counter to the **Rural Policy and Design Guidance, 2014: Policy 1.2D – Soil conservation and monitoring:**

The Authority, in conjunction with the AAC, will actively promote soil conservation and monitoring measures, by adopting the following overarching principles:

1. A general support in favour of in situ soil conservation;
2. Appropriate evaluation of existing soil quality within those sites/land onto which rural development proposals are submitted; and
3. The controlled re-use of soil within the same arable holding rather than soil relocation

b. Policy 1.2F - Protected Species and their Habitats:

Proposals which would damage and/or disturb (directly or indirectly):

- a) Any protected species of wild flora or fauna; and/or
- b) Any habitat of protected species of wild flora or fauna, whether manmade or natural, and including any important breeding, rearing or resting sites, will not be permitted, unless the Authority is certain that all legal requirements and conditions of the relevant environmental regulations are satisfied.

c. Policy 1.2G – Protected areas, special areas of conservation and special protected areas:

Proposed developments which would have an unacceptable adverse environment, landscape, cultural or archaeological impact will not be permitted.

d. Policy 1.2H – Protection of landscape features:

The Authority will seek to conserve, maintain and enhance important landscape features that will contribute to:

- the connectivity, appearance and/or integrity of protected areas, sites and/or features,
- the character, scenic or ecological value of the rural area.

This encroachment disturbs land on which there are protected flora, water courses, and historic water channels.

The application runs counter to the **Strategic Plan for the Environment and Development,**

a. Thematic Objective 1.10:

To manage the available potential space and environmental resources on land and sea sustainably to ensure that socioeconomic development needs are met whilst protecting the environment and limiting land take up within the Rural Area by socio-economic development should ensure that rural areas are not exploited by uses which are not legitimate necessary.

b. Thematic Objective 7.6 and 7.7:

To promote the efficient use of resources including local stone, water and soil, and manage waste in a manner that safeguards natural processes, and minimises impacts on cultural heritage, landscape and human health by:

6. Controlling the location of development to prevent soil sealing and erosion

7. Protecting agricultural land and gardens to prevent loss of soil and soil sealing.

c. Thematic Objective 8.1 and 8.7:

To safeguard and enhance biodiversity, cultural heritage, geology and geomorphology by:

1. Identifying, designating and managing areas, buildings, structures, sites, spaces and species for protection and appreciation.

7. Controlling activities which might have an impact on areas, buildings, structures, sites, spaces and species with a general presumption against the demolition of scheduled and vernacular buildings.

d. Rural Objective 1.1 and 1.7:

To facilitate sustainable rural development and the diversification of activities within the Rural Area to sustain agriculture and safeguard its distinctiveness by:

1. Protecting good quality agricultural land from development.

7. Controlling the cumulative effect of rural development.

e. Rural Objective 4.3c:

To protect and enhance the positive qualities of the landscape and the traditional components of the rural landscape by identifying and classifying a hierarchy of landscapes to guide the control of location and design of development within the landscape.

The application runs counter to both these policies, wasting agricultural land on an unnecessary project that could easily be replaced by a straightforward resurfacing of the road. We call on the Planning Authority to put a stop to practices which have degraded our countryside and created choked-up, car-centric environments that undermine residents' health and Gozo's tourism potential.

Moreover, FAA maintains that the waiver of the EIA is illegitimate, and runs counter to the EU EIA Directive.

The names of the witnesses we shall be presenting are not available at the moment but will be communicated shortly.

Astrid Vella



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