

COMMENTS BY DIN L-ART HELWA

- A. Din I-Art Helwa objects to the inclusion of 2(f) and 2(g) which allow the relocation of urban fuel stations to rural ODZ sites. These two clauses should be removed from the policy.

The *Malta State of the Environment Report 2018* (p. 21) states that “the cumulative impact of development on the limited virgin land is a cause for concern”.

Furthermore, the *Strategic Plan for the Environment and Development 2015* (p. 25), Rural Objective 3, stipulates that:

SPED Rural Objective 3: To guide development which is either justified to be located in the Rural Area in approved Government policies, plans or programmes, or is incompatible with urban uses and where alternatives are not possible, to the Rural Area away from protected areas and areas of high landscape sensitivity, preferably on Areas of Containment, previously developed land or existing buildings while ensuring the improvement of the quality of the rural environment by

- 1. Setting out a policy framework to control the location and design of such development and guide appropriate environmental measures*
- 2. Safeguarding existing Areas of Containment and identifying further Areas to accommodate incompatible urban development*
- 3. Controlling the cumulative effect of such development*
- 4. Requiring compensation measures to enhance the rural environment*

Policy 2 should set a hierarchy of preference for relocation as outlined in the SPED, that is, Areas of Containment, previously developed land or existing buildings, should be considered BEFORE any other Rural Areas outside the development zones are accepted by the Planning Authority.

- B. The proposed policy does not stipulate a minimum distance between fuel stations.

The SPED requires “Controlling the cumulative effect of such development” in rural areas.

