



Director of Planning,
Planning Authority,
St Francis Ravelin,
Floriana, Malta

10.04.2020

PA/4059/19
Site at (Field), Triq il-Hwawar, Iklin

Applicant: Raymond Gauci
Our Ref: LJA.CB.593

Proposed installation of three greenhouses for snail farming

RE: Outline of Proposal Clarifications - ERA CONCLUSION AND RECOMMENDED WAY FORWARD

To whom it may concern,

With reference to Correspondence with ERA dated 7th April 2020, below please find relative information and justifications in reply to Reasons for Recommendation by ERA highlighted here under:

- 1. According to the title on E-apps, the proposal seeks to construct three greenhouses. However, as already mentioned in ERA's reply (PA/04059/19/9a), through email communications and the PDS submitted, it transpired that these greenhouses shall be used for snail farming. The PA application and/or the PDS (including the title of the proposal in the respective documents) should be updated so that they are mutually consistent and duly represent the same single version of the proposed project.*

Reply:

In view of the above statement, the proposal Description has been amended.

- 2. The proposed area is surrounded mainly by agricultural fields with patches of secondary maquis and related habitats (clumps of trees, vegetation within and around rubble walls, etc) that also act as ecological corridors and ecological 'stepping stones'. Given the nature of the project and the nature of the site surroundings, there is a potentially significant risk of adverse impacts on the surroundings in the event of any accidental escapes into the wild, as the snails' foraging would be expected to be deleterious to natural and cultivated vegetation. The magnitude and probability of such impact on the environment is unclear and thus an environmental risk assessment study would be needed.*

Reply:

In view of the above statement, a risk assessment has been submitted as per document 71a.



3. *During screening, it was noted that the original site plan (PA04059/19/1a) does not tally with the latest block plan submitted to the Planning Authority on 28th November 2019 (PA04059/19/44a), and that the actual extent of the relevant site is significantly larger than indicated in the PDS. Clear confirmation of the full extent of the applicant's holding is required, as this has a material bearing on the environmental merits of the case, as follows: (i) presenting a comprehensive picture of the actual site context and the likely evolution of the situation on site pursuant to the project; (ii) exploration of alternatives for optimisation of the layout and positioning of the proposed structures and their ancillary access arrangements, to minimise uptake of open land and direct/concentrate the development into less pristine parts of the site; and (iii) ensuring that development on site is assessed holistically, including the proposed structures as well as other existing built structures not shown in the current submissions.*

Reply:

In view of the above statement, and discussions held on site during a site visit with ERA, the Site owned by the applicant is that as highlighted in the original site plan. This has never changed throughout the application process. A revised block plan was submitted to highlight the common use of a reservoir belonging to the adjacent site requested as per below:

Policy 2.6: The Committee objects to the three greenhouses since these are not accompanied by a reservoir as per RPDG, 2014 (Agricultural Directorate)

Whilst as mentioned the use of snail farming does not require a reservoir, and we feel that a construction of such will disturb the land further, a reservoir with right of use in the adjacent land was included to satisfy the requirement.

4. *The proposed demolition of one of the rooms in the original site plan (PA04059/19/1a) has been noted. Additionally, the latest block plan also shows various other scattered structures for which no permit could be traced (Figure 5). The removal of illegal structures should be a pre-requisite for further consideration of the proposed development, and the plans should be amended to reflect such changes.*

Reply:

As mentioned in the reply to point 3, the land being mentioned is not owned by the applicant and has no intention to use such land for the purposes of the application.

5. In view of the more extensive site, the potential relocation of the proposed structures (e.g. integration into other parts of the site that are already parcelled and impacted) merits further consideration, so as to minimise further loss of open rural land. Additionally, it also appears that the site has more than one access, resulting in increased land uptake for potentially redundant facilities. Hence, clarifications on the existing site accesses are also to be shown on the revised plans, and the proposal should also seek to minimise such land uptake.

Reply:

As per the below Figure and discussions on site, the location chosen for the green houses, was considered in detail during planning stages. The area earmarked is the least disruptive, visible, and furthest away from the residential areas. It is also important to note that the Green houses are considered as temporary structures and have minimal impact on the agricultural land. Access marked in Red shall be used as per Figure 1 as this is disturbed land in order to minimise further uptake of open rural land.



Figure 1: Block Plan

Whilst I hope that the above is to your satisfaction, it is in our opinion very evident that the proposal is not speculative but in line with similar commitments and site restrictions. The documentation submitted together with the risk assessment highlight the professional approach of the client and should be considered during the application process.

Should you require any additional information, please do not hesitate to contact us.

Many thanks for your cooperation,