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Moviment Graffitti reactions the to fuel service station policy revision

Moviment Graffitti is participating in the overdue, interminable process for the revision of the Fuel Service Station Policy. It is with disappointment that we note the continuous foot dragging by the authorities responsible as well as the repeated tweaking of the policy in a manner which suggests that particular interests are being prioritised, resulting in a half-baked policy riddled with loopholes.

While acknowledging the undoubted improvement over the policy currently in effect, primarily through the reduction in maximum size considered for fuel stations on ODZ from 3,000sqm to 1,000sqm and the reduction of ODZ sites deemed suitable for such relocations, Moviment Graffitti nonetheless remains concerned with several aspects of the latest revisions.

1. Point 2(f) has been changed significantly following the close of the public consultation process, and now opens the door to the relocation of large urban fuel stations of 1,000sqm or more to ODZ areas. It also still foresees the "upgrade" or increase in size of ODZ fuel stations to accommodate "ancillary services". This point leaves the door wide open for more car washes, mechanic's garages, tyre services, shops, ATMs and other regular commercial services.
2. Point 2.g allows the relocation of fuel stations to "*permitted/legally established site ODZ pre 1978*". The fact that ODZ land remains available for development, notwithstanding the increased constraints in that regard, continues to devalue the ODZ classification. Moviment Graffitti stresses that ODZ should remain ODZ, and land already committed should not continue to be degraded, but should be returned to its natural state or used for agriculture. A similar loophole has led to the loss of a lot of ODZ land for residential purposes. We can expect the same if the proposed policy goes through. To err is human, to persist is criminal.
3. The responsibility placed on the Agricultural Advisory Committee to identify 'Good Agricultural Land' adds another layer of bureaucratisation to the gradual take up of our remaining open space which will confer no protection or foresight, but simply rubber stamp decisions taken elsewhere. One can recall the case of the Luqa fuel station, where, despite the site's designation as good agricultural land by ERA and an Area of Agricultural Importance in the South Local Plan, the Agricultural Advisory Committee's silence condemned the fields to development.
4. The proposed policy requires no limit on size and no minimum distance between fuel stations, including those in Areas of Containment. It is to be highlighted that Areas of Containment are ODZ sites, and that the procedure for their revision has been called into question due to lack of oversight. This may open the door to massive complexes of commercial services for cars, using the excuse of dispensing fuel to justify the take up of large parcels of land.

Thus, all relocated fuel stations should have a reasonable footprint limit which ensures 1) that land will be primarily used for dispensing fuel, not other uses and 2) that the total amount of land taken for fuel stations is not excessive, since this would be taking up space needed for more important uses. Additionally, as it makes no sense to have many fuel stations next to each other, a minimum distance should be set.

Apart from these points, Moviment Graffiti continues to insist, as it has in previous submissions, that:

- a. this policy revision is approved and implemented as a matter of urgency in a matter of weeks, not months.
- b. the Planning Authority suspends all pending fuel service station applications until the proposed policy comes into effect.
- c. no new petrol stations are to be approved, anywhere.