Pok. 2.

ODZ POLICY AND DESIGN GUIDANCE **Comments and suggestions by Alfred E. Baldacchino** DPA.; Dip. Env. Sc.; PG Dip. Env. & Mangt.; MSC (Env. Plan & Mangt)
Wara li qrajt id-dokument *ODZ Policy and Design Guidance* imħejji mill-MEPA f'Jannar 2014, mibgħut lili fl-4 ta' Marzu 2014, li qed jiġi diskuss mill-Kumitat Permanenti għall-Ambjent u l-Ippjanar tal-Iżvilupp, qiegħed nagħmel l-evaluazzjoni u suġġerimenti biex dawn bil-għan li dawn iwasslu biex din il-politika tkunu waħda sostenibbli mingħajr impatti negattivi soċjali, ekoloġiċI u ekonomiċi.

Taqsima	Kummenti/suġġeriment	MEPA COMMENTS
Glossarju	Hemm xi termini u referenzi ta' Awtoritajiet li għandhom jidħlu fil-glossarju kif indikat aktar 'l isfel.	
	Ecological, scientific, cultural, archaeological, landscape and scenic value: Ma hemm l-ebda referenza għall-i*Special Protection Areas* u *Special Conservation Areas* li t-tnejn jifformaw in-Natura 2000 sites skont l-obbligi tal-EU. Meta f'din il-politika dawn iż-żoni, mal-ispeċi li jħaddnu huma l-aktar li jistgħu jigu milquta negattivament, ma narax għaliex dawn għandhom jitħallew barra. Inħoss ukoll li l-kelma **biodiversità** hija neqsa kompletament mid-dokument u għall-istess raġuni għandha wkoll tiġi miżjuda fil-glossarju u fit-test, skont id-definizzjoni li tingħata fil-*Convention of Biological Diveristy* li Malta hija msieħba fiha, u li fuqha hemm ukoll Deciżjoni tal-EU.	Policy 1.2G deals with these specific sites, rrefer to the para beneath the policy. The scope of this document was the revision of the 3 docs. Biodiversity was never mentioned.
Introduzzjoni 01.	*Proposal which are not addressed by this policy document may be considered on their own merits by the relative entities if it is felt that the propoosals will generate an imporvement to the area where it is located.* Liema huma l-entitajiet relevanti, u kif dawn il-propposati mhux inklużi fil-dokumenti jistgħu jtejbu ż-żona fejn hija lokata. Dawn jinkludu biss żvlipp kummerċjali jew jinkludu wkoll titjib fil-biodiversità, fl-ekonomija u fil-qasam soċ1jali b'mod sostenibbli?	As mentioned in the sentence before the quoted one, the policy shall be used by the deciding body on development planning applications.
0.4	*...most of the countryside owes its character to agriculture.* Jekk wieħed jieħu dan bħala bażi tad-dokument, allura l-impatt negattiv ekoloġiku sejjer ikun kbir. L-impatti negattivi fuq dan l-ambjent naturali li hemm bħalissa, ngħidu ahna l-ilma (tniggiż, użu, abbuż, qerda ta' flora u ta' fawna, tkissir tal-ekosistemi) huma kollha riżultat tal-agrikultura. U jekk wieħed ma jieħux dawn inkonsiderazzjoni allura dawn sejrin imorru mill-ħazin għal agħar.	The level of scheduling has been included in each of the policies. Infact areas of ecological importance have been protected.
0.11	*Various other European and national obligations do not have a direct influence on the land use planning system* Huwa żball kbir li wieħed jaħseb hekk. U dan il-ħsieb huwa rifless fid-dokument kollu. Kemm il-*Habitrats Directive* kif ukoll il-*Bird Directive*, kif ukoll it-trasposizzjoni tagħhom f'regolamenti nazzjonali għandhom obbligi li jindirizzaw l-użu tal-art. Dan biex ma nsemmux direttivi oħra bħall- *Water Framework Directive* u l-*Nitrate Directive*, kif sejjer ukoll nirreferi aktar il-quddiem.	The first paragraph of 0.11 clearly states that this document takes account of environmental obligations eg EIA's and conservation of SAC's and SPA's.

0.20	*MEPA will monitor the operation and implementtion of the polcies of this document and will periodically review them to ensure that they will remain up to date and effective.* Hawnhekk qed tintefa' responsabbiltajiet fuq il-MEPA liema responsabbiltajiet la huma tagħha u lanqas sejrin ikunu tagħha fil-futur qarib, dejjem skont il-Programme Elettorali tal-Gvern. Wieħed jistenna li minn hin għall-ieħor il-MEPA ma jkollhiex x'taqsam mar-risponsabbiltajiet tal-Ambjent. U kif indikat fid-dokument dawk tal-Agrikoltura, dawk tas-Saħħa u dawk tal-Riżorsi, bħall-ilma u ħamrija qegħdin taħt ir-responsabbiltà ta' entitajiet oħra. Xhini r-raġuna li l-MEPA qed tassumi dawn il-responsabbiltajiet meta kulħadd jaf li fejn jidħol l-enforzar tal-ligi l-MEPA kważi kważi hija noneżistenti, aktar u aktar meta dawn ma humiex taħt l-obbligi legali tagħha. U meta wieħed jara n-nuqqas ta' interess fl-ambjent li sal-lum il-MEPA għadha risponsabbli tiegħu, wieħed jistenna affarijiet li xejn mhu sejrin ikunu sbieħ kemm għall-ambjent kif ukoll għas-soċjetà ġenerali.	As already stated in the glossary MEPA has been defined as Malta Environment and Planning Authority or its successor. This was imposed with the separation of the Planning and the Environment in mind.
0.21	*There may be a particular circumstances where justified variations from this document will be considered by the decididng body. More responsility has been given to consultees and it is expectedthat the report submitted, by the consulting body proves sufficient justification when departing from the policy document.* Meta wieħed iqis li ma hemm l-ebda definizżzjoni ta' minn huwa l-*deciding body*, u wieħed jara li l-ġustifikazzjoni tiegħu tkun biżżejjed, mingħajr ma wieħed jispjega minn min sejjer ikun kompost dan id-*deciding body*, hawnhekk wieħed jista' faċilment jikkonkludi li d-*deciding body* jiddeciedi favur il-proposta u mhux kontra. Barra minhekk il-*consulting body*, f'hiex sejjer ikun ikkwalifikat: fl-iżvilupp, fl-agrikultura, fl-ekoloġija, fil-qasam ekonomiku, fil-politika, jew fil-qasam soċjali. Fl-opinjoni tiegħi jekk dan il-*deciding body* ma jkunx kompost minn dawn ir-rappreżentanti kollha, allura id-deċiżjoni bilfors sejra tkun waħda meħuda barra u mbagħad approvata mill-dan id-*deciding body*.	It is assumed that the deciding body shall be composed of people with integrity who can justify its decisions Consultations shall be made with the relevant consultees as mentioned in each policy.
PART 1:	**GENERAL POLICIES AND OBJECTIVES**	
1.1.2	Meta wieħed jaqra dan il-paragrafu wieħed jara kemm il-qasam tal-biodiversità ma ngħatax attenzjoni, biex ma ngħidx li tħalla barra għalkollox. Għaliex ma hemm l-ebda ekoloġista jew *environmental manager*, meta l-ODZ huma mħarsa speċifikament minħabba l-ekosistema importanti tagħhom?	Biodiversity in terms of social and environmental benefits are mentioned.
1.1.2	*Development which requries a rural location is carried out in a sensitive manner and in a suitable locations, while contributing to an overall imporvement of the rural environment for the benefits of society and the local rural economy.* Hawnhekk terġa tispikka n-nuqqas ta' importanza mogħtija lill-biodiversità li hija nieqsa kompletament. Jekk din hijx nieqsa	Same as above. Also as stated in

	minn dan id-dokument bi żball, jew inkella bħala nuqqas ta' għarfien tagħha ma nafx. Imma dan semmejtu anki fl-aħħar laqgħa fejn għidt, mingħajr ma kont għidna qrajt id-dokument, li l-argumenti kollha li nġabu kienu neqsin b'mod allarmnati f'interess tal-biodiversità f'dan id-doklument li jiffoka aktar biex jaqdi żvilupp dejjaq milli żvilupp sostenibbli li ma jkollox impatt ekoloġiku, soċjali u ekonomiku.	one of the objectives, a balance between the planning and the environment has to be ensured.
General Policies	**NATIONAL POLICY PROJECTS**	
1.2.A	Hawn jidher in-nuqqas ta' referenza għall-Awtorità għall-Ħarsien tal-Ambjent, kif tidher u tinhass mad-dokument kollu. Qisu ma hemm l-ebda ħeġġa biex l-ambjent u l-biodiversità ikolhom x'jaqsmu tad-deċiżjonijiet ta' dan l-ivilupp. Dan minbarra li konsultazzjonijiet pubbliċi ma jissemmewx imkien.	
1.2.B.(1)	Lanqas hawn ma hawn ebda referenza għall-Awtorita' għall-Ħarsein tal-Ambjent li hija waħda mill-awtoritjiet ewlenin li tinteressaha u li tagħti sehemha f'din il-policy fl-ODZ.	
1.2D	**SOIL CONSERVFTION AND MONITORING**	
1.2.D	Hawnhekk tissemma Awtorità li kif ġbidt l-attenzjoni qabel 1.2.B.(1), ma hemm l-ebda definizzjoni minn hi jew minn min hi magħmula. Aktar u aktar meta fil-ġranet li ġejjin wieħed jistenna li l-Awtorità għall-Ħarsien tal-Ambjent sejra tkun separata mill-MEPA. Hemm xi raġuni għaliex din l-Awtorita għall-Ħarsient tal-Ambjent ma tissemma kważi xejn? Dan bilfors iwassl għall-ħsibijiet li jinkwetaw lill-dawk l-istakeholders li għandhom l-għan li l-ambjent nazzjonali jiġi mħares minn attivitjaiet kummerċjali.	As per glossary The Authority is MEPA or its successor, as explained above.
1.2.F	**PROTECTED SPECIES AND THEIR HABITATS**	
	Anki hawn fejn l-Awtorità Kompetenti f'dan il-qasam anki kif magħrufa mal-Unjoni Ewropea hija l-Awtorità għall-Ħarsien tal-Ambjent, ma tissemma xejn. Għaliex dan il-nuqqas ta' għarfien għall-bżzonn tal-ħarsien tal-biodiversità, u f'qasam fejn suppost hemm Awtorita Kompetenti f'dan il-qasam.	Policy 1.2G considers all the Protected Areas.
PART 2.	**FARM DWELLINGS AND AGRICULTURAL BUILDINGS**	
2.2.A	**New farm dwellings for livetock farmers**	
2.2.A.(1)	Hawnhekk tissemma l-*Agriculture Advisory Committee.* Dan min hu? Ma hemm l-ebda definizzjoni tiegħu fil-preambolu. Għaliex? Min min hu kompost? U anki hawn terġa tispikka n-nuqqas tal-Awtorità għall-Ħarsien tal-Ambjent. Hawnhekk bdejt naħseb li dan huwa żball bil-ħsieb, aktar u aktar meta din l-Awtorità hija l-Awtorità Kompetenti magħrufa mill-Unjoni Ewropa għall-*Environment Acquis,* f'dan il-qasm l-aktar il-*Water Framework Directive.* Ma tantx jidher li kien hemm diskuzzjoni wiesa' jew fit-tul mal-esperti tal-Gvern fil-qasam tal-ħarsien tal-ambjent u tal-biodiversità. U hawn ma nagħtix tort lil min qed jaħseb ħazin, inkluż jien.	Terms of reference of the AAC have been submitted. Policy 2.2A(7) considers scheduled areas for dwellings outside the farms. Within the actual livestock farm there is no scope because the land is already committed.
2.2.A.(3)	Huwa ferm importanti li rziezet tal-annimali ma jkunux qrib jew f'*water catchment areas* li jisqu il-ħażna tal-ilma taħt l-art, kemm	Consultation has been made with the MRA and its

	dak ta' fuq kif ukoll dak tal-pjan. Imma ma hemm l-ebda referenza jew kondizzjoni li tissalvagwardja dan ir-riżors.	concerns included in the relevant policies.
2.2.a.(9)	U jekk dan ikun ta' imnportanza għall-ilma tal-pjan? Dan huwa wieħed mill-perikli li l-bord konsultativ ma għandux ikun magħmul biss mill-agrikultura li la għandhom responsabbilta' legali f'dan il-qasam u lanqas esperjenza.	As mentioned in the policy consultation shall be made with the MRA.
2.2.A. conclusjoni	Dan ifisser li rziezet tal-bhejjem jistgħu jkunu mqabbda mad-dranaġġ pubbliku?	This policy deals with dwellings not farms.
2.2.B.	**FARM DWELINGS FOR ARABLE FARMERS**	
	Hawnhekk jerġa jissemma l-*Agriculture Advisory Committee.* Hawnhekk ukoll mhux ċar min min huwa magħmul minħabba li ma hemmx definizzjoni tiegħu, kif ikun hemm f'kull dokument.	Same as above.
2.3	**AGRICULTUREAL BUILDING FOR LIVESTOCK FARMERS**	
2.3.A.	**Existing livestock farm units (including pre-1994 farms)**	
2.3.A.(2)	Hawnhekk jerġa jispikka n-nuqqas ta' referenza għall-Awtorità għall-Ħarsien tal-Ambjent, li hija l-Awtorità Kompetenti għall-obbligi ta' ċerti responsabbiltajiet tad-Direttivi tal-UE.	No consultation because the policy deals with existing already permitted farms.
2.3.A.(3)	Mingħajr dubju l-Awtoritaà tar-Riżorsi għandha tidhol minħabba l-obbligi tal- *Water Fraemwork Directive* tal-UE, kif ukoll l-Awtorità tal-Ħarsient tal-Ambjent minħabba obbligi simili.	MRA is included as per previous para.
2.3.B.	**NEW OR RELOCATED LIVESTOCK FARMS**	
2.3.B.(1)	Terġa tispiċċa n-nuqqas ta' referenza għall-Awtorità tal-Ħarsien tal-Ambjent.	Proposals on scheduled land will not be considered as per policy para 2.
2.3.B.(5)	Wieħed għandu jikkonsulta mal- *Water Frameeork Directive* li tiddelinea l-postijiet importanti għall-ħażna tal-ilma. Għalhekk għandha titieħed inkonsiderazzjoni wkoll li mhux biss is-sors minn fejn jittella' l-ilma imma anki s-sors li tipprovdi l-ilma. Ikun għal xejn jekk razzett bħal dan ikun 'l bogħod minn fejn sejjer jittella' l-ilma u mbagħad iniggeż l-ilma f'inħawi li jisqi l-ilma tal-pjan jew lil xi spira jew bir.	The paragraphs 5 and 6 were included after meetings with the MRA.
	Groundwater protection zone. Ma hemm l-ebda definizzjoni ta' din il-frazi. Din għandha tkun konformi mad-definizzjoni kif imniżżla fil- *Water Framework Directive*, fejn hemm numru ta' obbligi fuq il-pajjiż u kif hija trasportati fir-regolamenti Maltin.	*Groundwater* is included in the glossary (Directive 2000/60/EC, Water Framework Directive).
2.4	**SLAUGHTER HOUSES**	
2.4.(1)	Terġa tispikka n-nuqqas ta' referenza għall-Awtorità tal-Ħarsien tal-Ambjent.	The slaughter house shall be constructed within an operational farm.
2.5	**AGRICULTURAL STORES**	

	Hawnhekk tissemma n-*National Agricultureal Policy.* Din għada ma teżistiex u hemm biss rapport. Kif jista' wieħed jikkonforma ma' din il-*Policy* meta din għada ma teżistiex?	
2.5(1)	L-ebda referenza għall-Awtorità tal-Ħarsien tal-Ambjent. Wieħed irid iżomm f'moħħu li dan huwa żvilup f'ODZ. U l-ODZ ma jillimitawx biss il-bini, imma huma importanti għall-biodiversità li taqa' taħt ir-responsabbiltà tal-Awtorità għall-Ħarsien tal-Ambjent.	Protection of scheduled land as per para. 4
2.5(5)	Huwa possibbli li f'dan l-iżvilupp ġdid jittieħdu miżuri biex ikun hemm ħażna tal-ilma tax-xita? Dan minħabba li dan ir-riżors, minbarra li huwa skars, u dejjem qed jiskarsa u d-domanda għalih dejjem tikber, l-ilma tax-xita qed jiġi mormi l-baħar jew inkella jiġi provdut minn distillaturi li jagħmluh għoli fil-prezz, u jarmu gassijiet fl-arja li suppost hemm obbligu li nikkontrollaw. U minħabba f'hekk hawn inħoss li għandhom jiġu kkonsultati kemm il-*Malta Resource Authority* u l-Awtorità għall-Ħarsien tal-Ambjent li huma l-Awtoritajiet Kompetenti għall- *Water Framework Directive* tal-UE.	The provision of the reservoir could be considered on a case by case basis, especially in cases where there is no basement. MRA are one of the consultees as per para. 1
2.6	**GREENHOUSES**	
2.6(1)	Anki jekk ikun part time?	Yes.
2.6(3)	Dawn jistgħu wkoll ikollhom impatt negattiv fuq il-biodiversità. U għalhekk importanti li l-Awtorità għall-Ħarsien tal-Ambjent tkun involuta.	Scheduled land is protected as per para 4.
2.6(5)	Is-siġar użati biex itaffu l-impatt viżiv għadhom ikunu siġar indiġeni u mkabbra minn stok lokali. Dan biex ma jiddaħħlux speċi invażi li jwettqu ħsara fil-biodiversità lokali, kif ukoll biex l-istruttura ġenetika lokali ma tkun imniġġza. Dawn it-tnejn huma obbligi li l-pajjiż għandu taħt numru ta' Konvenzjonijiet internazzjonali, kif ukoll dawk tal-Unjoni Ewropea.	Landscaping shall be considered on a case by case basis as required in para. 5.
2.6(8)	Hawnhekk ta' minn jispeċifika id-daqs tal-ġibjun relatat mad-daqs tas-serra. Ikun inutli li jinbena ġibjun, biex taparsi nbena ġibjun. Barra minhekk, ikun għaqli li wieħed jagħmel kondizzjoni mal-użu tal-erbiċidi, insettiċidi, fungiċidi, u fertilizzanti, kollha kimiċi li qed iħallu tant impatt kbir u negattiv kemm fuq l-ispeċi ta' fawna u ta' flora, kif ukoll fuq l-ilma tal-pjan.	Again this is considered on each application. A condition may be imposed on a case by case basis.
2.7	**RESEVOIRS AND PUMP CHAMBERS**	
2.7A	**Water reservoirs and pump chambers**	
2.7(4)	Hawnhekk fejn tissemma għall-ewwel darba l-Awtorità għall-Ħarsien tal-Ambjent. U hekk għandu jkun. U din għandha wkoll tiġi inkluża kif issuġġerit qabel u aktar 'l quddiem. Ta' minn jinnota wkoll li din l-Awtorità għall-Ħarsien tal-Ambjent hwnhekk tissemma b'mod distinta mill-Awtorità għar-Riżorsi Maltin.	MEPA is mentioned because this is a notification and not a planning application.
2.7(5)	Tissemma **Awtorità** li ma hemm l-ebda definizzjoni tagħha u liema	Refer to glossary.

	Awtorità hi. Għalhekk huwa importanti li din l-Awtorità tiġi kwalifikata minn hi. Hemm xi raġuni għaliex din il-*pump chamber* ma tiġix kollha taħt l-art jew inkella filata jew tnjen 'l fuq biss?	For easy access and to prevent problems of water penetration.
2.7.1.	Huwa possibbli li dawn il-*pump chambers* ikunu miksija bil-pjanta Maltija Liedna, biex ma jkunux ta' impatt negattiv viżiv fil-kampanja.	The pump chamber shall be constructed in recycled stone to reduce visual impact.
2.7bB	**TRADITIONAL WIND DRIVEN PUMPS**	
2.7.5.	F'dan il-paragrafu tissemma l-**Awtorità.** Liema Awtorità hi din: dik tar-Riżorsi tal-Ilma; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra?	MEPA and its successors as per glossary.
2.8	**LAND FOR AGRICULTURAL USE**	
2.7.6	Taħt din it-taqsima dan il-paragrafu innumerat 2.7.6. li naħseb li jrid jiġi 2.8. Hawn ukoll tissemma l-**Awtorità**. Liema Awtorità hi din: dik tar-Riżorsi tal-Ilma; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra?	MEPA and its successors as per glossary.
2.9	**LAND DEMARCATION (AND SUBDIVISION OF PROPERTY) AND RUBBLE WALLS**	
	Fil-paragrafu tal-ftuħ tissemma l-**Awtorità.** Liema Awtorità hi din: dik tar-Riżorsi tal-Ilma,; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra? F'dan il-paragrafu wkoll hemm referenza għall-ġebel qadim ta' bini mwaqqa' li jsta' jintuża għall-bini tal-ħitan tas-sejjiegħ. Dan mhux konformi mal-Avviż Legali 160 tal-1997 dwar il-bini tal-ħitan tas-sejjieħ. Hemm xi ħsieb li din il-liġi tiġi revokata, jew li l-MEPA tagħti permessi li ma humiex konformi mal-bini ta' dawn il-ħitan? Ninbarra l-fatt li l-karatteristika tal-ħitan tas-sejjieħ sejra tiddgħajjef, bl-impatt negattivi kollha tagħha, jidher li ma kienx hemm kontribut minn naħa tad-Direttorat tal-Ħarsien tal-Ambjent, għaliex kif spjegat fil-Avviż Legali dwar il-ħitan tas-sejjieħ hmwa meqjus bħala *habitat* li jgħati kenn lil numru ta' fawna u anki ta' flora kemm matul ix-xhur sħan tas-sajf kif ukoll matul dawk tax-xitwa. Hawnhekk tispikka kif qed tingħata aktar attenzjoni lill-iżvilupp mill-aspett finanzjarju, għas-spejjes imħallsa mill-aspett ekoloġiku.	MEPA and its successors as per glossary. The methodology of construction shall remain the same. It is a known fact that "gebel tax-xaghri" is difficult to find. The franka stone to be used shall be in random-sized irregularly shaped stone.
2.9(2)	Ir-referenza għall-bini tal-ħitan tas-sejjieħ hija l-istess bħal dik ta' fuq 2.9.	Same as above.
2.9(3)	Dawn l-imlieqi (*hedges*) għandhom ikunu magħmulin minn speċi ta' pjanti/siġar indiġeni Maltin, li jkunu mnissla minn siġar lokali. Dan biex ma jkunx hemm dħul ta' mard u speċi oħra invażivi, kif ukoll biex ma tiġix imniġġsa l-istruttura ġenetika ta' speċi indiġeni.	This can be a condition in the permit.

2.9(5)	Ir-referenza għall-bini tal-ħitan tas-sejjiegħ hija l-istess bħal dik ta' qabel 2.9.	Same as above.
	Fil-paragrafu tal-aħħar hemm li x-xatbiet (*gates*) iridu jkunu approvatu u bil-permess. Ta' liema Awtorita?	Same as above.
2.9(1)	Hawnhekk qed jiġi ġustifikat li minħabba li hemm nuqqas ta' gebel tal-gagazza allura wieħed jista' juża ġebel qadim tal-franka. Dan argument li jiġġustifika biss l-interess finanzjarju u mhux dak ekoloġiku. Minbarra li huma karatteristiċi tal-kampanja Maltija, il-ħitan tas-sejjiegħ kif mibnija tadizzjonalment huma wkoll ambjent ekoloġiku importanti Għalhekk ma għandhomx jinbnew bil-franka, u mingħajr ebda użu tas-siment. Dan ikun konformi mal-Avviż Legali 160 tal-1997 dwar il-bini tal-ħitan tas-sejjieħ. Hemm xi ħsieb li din il-liġi tiġi revokata, jew li l-MEPA tagħti permessi li ma humiex konformi mal-bini ta' dawn il-ħitan?	The use of franka stone is already explained above.
2.9.2.	Hawnhekk jissemma *a narrow footpath.*: Naħseb li jkun għaqli li hawn jiġi speċifikat kemm għandu jkun dejjaq: metru, tnejn, tlieta. Dawn kollha jitqiesu li huma dojoq u huma miftuħa għall-interpretazzjoni. Naħseb li jkun għaqli li jitnizzel il-wisa' ta' din il-mogħdija.	This is an explanation paragraph. The policy mentions a maximum 30cms footpath.
2.9.2.	Hawnhekk jerġgħu jissemmew l-imlieqi (*hedges*). Jekk il-biodiversità ta' pajjina verament trid tiġi mħarsa, anki skond obbligi nazzjonali u internazjonali, allura għandu jiżdied li dawn iridu jkunu ta' speċi indiġeni u mnissla minn speċi lokali. Dan għal raġunijiet kif spjegati aktar 'l fuq.	Same as above.
2.10	**ACCESS TO ARABLE FARM HOLDINGS**	
	Fil-ftuħ ta' dan il-paragrafu tissemma **Awtorità**. Liema Awtorità hi din: dik tar-Riżorsi tal-Ilma; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra? Mingħajr dubju minħabba li dawn il-passaġġi huma importanti għall-biodiversità, għandha tkun involuta wkoll l-Awtorità għall-Ħarsien tal-Ambjent. Il-legalizzazzjoni ta' attivitajiet li saru bla permess inħoss li huwa diskriminazzjoni soċjali. Minn kiser il-liġi sejjer jiġi ppremjat u l-ambjent u s-soċjetà sejrin iħallsu għal din l-illegalita. Barra minn hekk dawn sejrin jifthu l-kampnja beraħ u jagħmluha aktar diffiċli biex din tkun imħarsa skont obbligi nazzjonali u internazzjonali.	Same as above, ie MEPA or its successors. These paths were constructed by the govt. and lead from the roads to fields. They are not on agricultural land.
2.10.2	Dawn ukoll sejrin jiftħu l-kampanja beraħ u jagħmluha diffiċli għall-ħarsien tagħha. Barra minhekk żoni bħal dawn jistgħu jkunu sensittivi mill-aspett ta' biodiversità.	The are lanes and not agricultural land.
2.10(3)	Kif spjegajt qabel, dawn iż-żoni huma sensittivi, infatti hemm uħud minnhom li jħaddnu fihom speċi li huma mniżżla fil-listi tal-Unjoni Ewropa u li Malta bħala pajjiż imsieħeb għandha l-obbligi li tipproteġi. Minħabba f'hekk huwa importanti li l-Awtorità għall-Ħarsien tal-Ambjent tkun involuta f'dawn il-permessi. B'disjpaċir ninnota li din l-Awtorita għall-ħarsien tal-Ambjent kważi ma tissemma xejn f'dan id-dokument ħlief darba. U huwa hawnhekk fejn hemm uħud li huma nkwetati b'dan id-dokument	Consultation shall be made with the Agriculture Dept. because this policy deals with arable land.

	għaliex l-aspetti ekoloġiki ftit li xejn ingħataw importanza meta mqabbel ma' dak tal-iżvilupp.	
2.10(4)	*Foot paths in compacted soil shall be created to facilitate access to the public.* Fil-kunċett dan mhux ħażin, imma wieħed irid ukoll joqgħod attent. Ngħidu aħna ma hemm l-ebda wisa' indikata tal-passaġġ. Passaġġi bħal dawn isiru b'mod naturali meta l-bidwi juża l-istess passaġġ. U dan ma jkunx aktar minn nofs metru. Wieħed irid ukoll jaħseb fl-uċuħ tar-raba' li ħafna drabi jsofru minnn nuqqas ta' ħsieb u għarfien tal-pubbliku. Dan il-paragrafu qed jagħmilha bħala obbligu li dawn il-passaġġi jridu jsiru. U mhux sewwa li biex forsi jkun hemm passaġġ li jagħti għal xi *boutique* imsemmi f'dan id-dokument jinħolqu passaġġi biex dan jinqeda. Għalhekk wieħed għandu jistudja aktar dan il-paragrafu u jara kif filwaqt li l-pubbliku jkollu aċċess minn dan il-passaġġ dejjaq, il-bidwi jkollu serħan il-moħħ dwar il-ħarsien tal-prodott tiegħu.	Footpaths which are defined in the glossary shall be max 30cms wide as per previous policy. Refer to glossary.
PART 3	**DEVELOPMENT RELATED TO WINE, OLIVE OIL, AND HONEY PRODUCTION**	
3.2	**WINERIES**	
3.2A	**New botique wineries**	
3.2A(6)	F'dan il-paragrafu tissemma **Awtorità.** Liema Awtorità hija din: dik tar-Riżorsi tal-Ilma; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra? Din terġa tissemma fl-għeluq ta' dan il-paragrafu. Din tinkwetani ftit li tissemma b'mod regolari din l-Awtorità mingħajr ma din hija definita. U din tista' wkoll twassal (għalkemm ngħid li din hija *lapsus)* biex ikun hemm minn jinqeda bil-permessi għas-spejjes ta' Awtoritajiet oħra. Għalhekk nisuggerixxi li jkun hemm Bord ta' nies tekniċi mill-Awtoritajiet kollha konċernati u msemmija f'dan id-dokument, biex jifformaw din l-Awtorità kif imsemmija f'dan id-dokument. B'dekk id-deċizjonijiet u l-permessi maħruġa jkunu kollha trasparenti u sostenibbli. Wisq nibża' li dawn il-*policies* ta' żvilupp huma indirizzati biċċa biċċa, u fejn hemm ukoll żvilupp ġdid possibli, sejjer ikollu impatt negattiv kbir fuq l-hekk imsejħa *Outside Development Zones,* kemm waqt il-bini tagħhom, kif ukoll matul l-użu tagħhom aktar u aktar mill-impatt mhux ikkontrollat jew meqjus taż-żjarat tal-pubbliku speċjalment fejn ma hemm xejn indikat kemm dawn jistgħu jkunu 'l bogħod mit-toroq asfaltati u kemm ikunu jistgħu jersqu lejhom bil-karozzi u makkinarju ieħor. Dawn il-kondizzjonijet għandhom jiddaħħlu fl-approvazzjoni ta' bini ġdid ta' dawn il-*wineries*, u azjendi oħra msemmija. Sfortunatament anki meta wieħed jaqra d-dokument, jara li l-aspett kummerċjali ngħata wisq aktar importanza minn dak soċjali u ekoloġiku bir-riżultat li dan qatt ma jista' jkun sostenibbli, minbarra li jagħmilha diffiċli biex l-obbligi ambjentali jkunu milħuqa.	MEPA and its successors. Same as above. Conditions shall be imposed on a case by case basis with restrictions as mentioned in the policy. It should be stated that the general policy 1.2C applies.
3.2B	**REDEVELOPMENT/CONVERSION OF BUILDINGS FOR BOUTIQUE WINERIES**	
3.2b(1)	Hawnhekk jerġa jispikka n-nuqqas tal-intervent tal-Awtorità għall-Ħarsien tal-Ambjent. U tant jinħass in-nuqqas tagħha sa hawn, li qisu hemm xi ħsieb li ma jkunx hemm xkiel żejjed biex attivitjiet kummerċjali jingħataw il-permessi. Ma nistax nara raġuni	The policy deals with redevelopment on land which is already committed with a permitted

	oħra valida għaliex din tħalliet barra kull fejn jidher li sejjer ikun hemm impatt negattiv ekoloġiku. Żgur li dan ma hux fl-interess tal-ħarsien tal-ambjent u fl-interess soċjali.	building. Therefore the impact is already there. Nothwithstanding, scheduled land is protected (para 5).
	Fl-aħħar paragrafu, jidher li filwaqt li hemm kull nuqqas ta' xkiel biex wieħed iħaffer taħt l-art għal raġunijiet biex jakkomodaw l-attività kummerċjali, ma hemm l-ebda ħjiel ta' xi deċiżjonijet biex tittaffa l-problema ta' nuqas ta' ilma u jinħażen l-ilma tax-xita li qed jiġi mormi l-baħar, u l-ilma li jintuża huwa dak li bi spejjes kbar kemm finanzjarji kif ukoll ta' problemi għall-pajjiż biex jitnaqqsu l-emissjonijiet fl-atmosphera ta' gassijiet li l-pajjiz suppost jikkontrolla u jilħaq ċertu livell. Jiddispjacini ngħid li dawn l-attivitajiet kummercjali qed jiġu mgħejjuna b'mod għami daqs li kieku dawn sejrin isolvu xi problema tal-pajjiż, imma fil-fatt qegħdin aktar jaggravawhom.	The use of basements is being permitted because there shall be no visual or ecological impact. Wineries were already part of the policy which is being revised. These are not new developments.
3.3	**OLIVE OIL PRODUCTION**	
3.3(f)	Referenza oħra għall-**Awtorità** li ma għandha l-ebda definizzjoni. Liema waħda dik tar-Riżorsi tal-Ilma; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra? Din terġa tissemma fl-aħħar paragrafu.	MEPA and its successors.
3.3B	**REDEVELOPMENT/CONVERSION OF BUILDINGS FOR OIL OLIVE PRODUCTION**	
3.3.B (a)	Għal darba oħra terġa tispikka n-nuqqas tal-involviment tal-Awtorità għall-Ħarrsien tal-Ambjent.	Same as in the wineries.
3.3.b		
3.3.2.	F'dan il-paragrafu jissemma konsultazzjoni. Ma min? Jekk il-konsultazjonijet ma jsirux b'viżjoni wiesgħa, imma jsiru biss mal-interessi diretti, allura kważi kważi jistgħu ma jsiru konsultazzjoni xejn. Jekk hu mixtieq li jkun hemm sinċerament deċiżjoni sostenibbli li tkun waħda li tieħu inkonsiderazzjoni l-għanijiet ekonomiċi, ekoloġiċi, u dawk soċjali, allura għandu jiġi indikat dawn il-konsultazzjonijiet ma' min għandhom isuru.	Consultation with the Agriculture Dept. because of the planting of olive trees.
3.4	**BEE KEEPING AND HONEY PROTECTION**	
3.4A	**New buildings for bee keeping and honey protection**	
3.4(a)	Għal darb'oħra terġa tispikka n-nuqqas tal-involviment tal-Awtorità għall-Ħarsien tal-Ambjent, issa b'mod regolari.	MEPA and its successors.
3.4		
3.3B	**Redeveloopment/conversion of buildings for bee keeping and honey processing.**	
3.3B(a)	Għal darb'oħra jerġa jispikka n-nuqqas tal-involviment tal-Awtorità għall-Ħarsien tal-Ambjent, issa b'mod regolari u sistematiku.	Same as in wineries.
3.3B(d)	Huwa tajjeb li dawn l-imlieqi (*hedges*) ikunu ta' speċi indiġeni imma kif spjegat aktar 'l fuq dawn għandhom ikunu mnissla minn eżemplari indiġeni li jikbru hawn Malta għal raġunijiet imsemmija aktar 'l fuq.	Same as above.

PART 4	**FARM DIVERSIFICATION**	
4.2	**New Farm Retail Outlets**	
4.2.(d)	*Competent Authority* ma għandha l-ebda definizzjoni. Liema waħda dik tar-Riżorsi tal-Ilma; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra? Għalkemm l-idea fl-aħħar paragrafu hija tajba, wisq nibża li dan mhux sostenibbli. Wara kollox kull bidwi għandu l-faċilità u l-permessi li jista' jbiegħ il-prodotti tiegħu.	The policy mentions the consultees specifically. Permits are required.
4.2.1.	l-argument huwa tajjeb imma bħal ma qed isir illum, ħafna minn dawn il-bdiewa u raħħala qed ikunu fuq it-tarf tat-triq bil-vetturi tagħhom ibiegħu l-prodotti tagħhom. Ħafna mill-bejgħ isir lil nies li jkunu għaddejjin. Jekk jingħata l-permess biex ix-xerrejja jidħlu ġewwa fl-għelieqi, allura sejjer jinħoloq impatt negattiv fuq iż-żoni 'l bogħod mit-toroq asfaltati. U ma naħsebx li dan hemm bżonnu.	A policy to regulate this was necessary. At present the vans are a traffic hazard apart from no regulation.
4.2.2.	Ara 4.2.1. hawn fuq.	Same as above.
4.3	**VISITORS' ATTRACTIONS**	
4.3A	**Conversions to visitors' attraction**	
4.3A(1)	Għal darb'oħra jerġa jispikka n-nuqqas tal-involviment tal-Awtorità għall-Ħarsien tal-Ambjent, issa b'mod regolari.	MEPA and its successors.
4.3A(5)	Referenza oħra għall-**Awtorità** li ma għandha l-ebda definizzjoni fid-dokument. Liema waħda dik tar-Riżorsi tal-Ilma; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra?	MEPA and its successors.
4.3A(6)	Jekk il-*carrying capacity* tal-proġett tingħeleb allura dan ikun ta' detriment kemm għan-negozjunnifsu, għall-ekoloġija tal-post u anki jkollha impatt soċjali negattiv. Dan ifisser li l-*footprint* tal-proġett sejra tikber u ma hemmx limitu għaliha. Din il-fragmentazzjoni ta' proġetti bħal dawn sejra jkollha impatti negattivi kbar għax sejra tiftaħ beraħ il-kampanja u b'impatt negattiv fuq l-ambjent ekoloġiku. Kif jista' wieħed iwessgħa l-post għall-*parking* mingħajr impatt negattiv fejn bl-użu ta' karozzi fuq il-post, il-ħamrija titbattam u ma jikberx ħaxix u bir-riħ u bix-xita tinġarr minn fuq il-post?	Policy 1.2C applies to this enterprise too. Para 3 states that no extensions will be permitted. Grass blocks for parking instead of concrete shall be allowed for the reason mentioned.
	Fl-aħħar tal-paragrafu ta' din it-taqsima terġa tissemma għal darb'oħra **Awtorità** li ma għandha l-ebda definizzjoni. Liema waħda dik tar-Ri żorsi tal-Ilma,; dik tal-Ippjanar; dik tal-Ħarsien tal-Ambjent, jew xi Awtorità oħra?	MEPA and its successors.
4.3B	**New Visitor's attraction**	
4.3B(ii)	Wieħed jista' faċilment jilħaq dan il-għan jekk il-*visitors centres* ikunu jintlaħqu mit-toroq asfsatati u jkun hemm wieħed għal kull żona, ngħidu aħna, għal kull żona tal-Kunsilli Lokalil jew reġjun. B'hekk ikun hemm il-gwadan tal-*economies of scale*. Hekk ikun hemm ukoll aktar konċentrazzjoni u l-prodotti jkunu jistgħu jiġu riklamati aħjar f'post wieħed mingħajr il-ħtieġa li l-kampanja	This is a Local Planning issue and in fact the policy makes reference to this.

	tinfetaħ b'aktar toroq, żvilupp u traffiku mingħajr kontroll u mingħajr limitu.	
4.3.1.	L-idea hija tajba imma din sejra tbati minn nuqas ta' *economies of scale* kif spjegat fil-4.3B(ii)	This is an explanation para not policy.
4.3.2.	Dan ikun iktar jista' jintlaħaq faċli minn ċentru reġjonali u jkun jista' jsir aktar b'mod professjonali milli jekk ikun separat u fragmentat. Jista' wkoll ikun aktar mgħammar b'appart ta' IT li minnu jgawdu kull minn ikun interessat. L-*economies of scale* toffri aktar faċilitajiet u tnaqqas l-ispejjes lil individwi li jkunu mħajjra jużawh.	Noted.
4.4	**AGRO-TOURISM ACCOMODATION**	
4.4	**Agro-tourism accomodation**	
4.4(2)	F'din it-taqsima jissemma Dipartiment/Awtorità. U hawnhekk wieħed jistaqsi liema department u liema Awtorità.	Due to the setting up of the farming enterprise, this could be arable or livestock which require different consultees.
4.4.(4)(a)	Impatt ta' dan il-bini ġdid jista' jkun ukoll jekk dawn ma jkunux fil-livelli skedati. Dawn l-impatti jistgħu jkunu kemm ta' ħsejjes, dawk ta' traffiku, servizzi pubbliċi u oħrajn. Wieħed irid ukoll jieħu inkonsiderazzjoni n-*Natura 2000 sites* li mhux biss tirregola dawn l-attivitajiet ġewwa d-delineazzjoni tagħhom, imma anki dawk barra mid-delineazzjoni li jista' jkollhom impatt minn barra. Dawn ma jissemmew xejn f'din il-*policy guidance*. Barra minhekk ma hemm l-ebda restrizzjoni jew obbligazzjoni jew kondizzjoni f'dan id-dokument li jista' jindirizza dawn l-impatt negattivi. Meta wieħed iqis il-mod kif l-Awtorità għall-Ħarsien tal-Ambjent, li hija l-Awtorità Maltija Kompetenti għall-obbligi tal-*Environment Acquis* tal-Unjoni Ewropea, u kif din tħalliet barra minn numru ta' attivitajiet f'dan id-dokument, allura il-ħsara u l-qerda tal-ambjent naturali hija mistennija li tkun akbar.	Natura 2000 sites are included in the sheduled sites mentioned in this policy. Scheduled sites are protected in the relevant policies and also in the general policies.
	ADDITIONAL CRITERIA FOR ALL AGRO-TOURISM PROPOSALS	
	Fl-ewwel paragrafu jerġa jispiċċa n-nuqqas tal-Awtorità għall-Ħarsien tal-Ambjent. U n-nuqas jidher aktar meta tissema l-Awtorità tat-trasport u hemm rabta mal-Awtorità tat-Trasport. Forsi hawnhekk wieħed jistaqsi jekk dan in-nuqqas ta' refreenza għall-Awtorità għall-Ħarsien tal-Ambjent ifisserx li r-respnsabbiltà u l-obbligi humiex sejrin jittieħdu kollha mill-Awtorità tal-Ippjanar. L-użu u l-approvazzjoni ta' *grass blocks for parking* ukoll sejjer ikabbar il-*footprint* tal-proġett, mingħajr limitu u kondizzjoni skont kif spjegat aktar 'l fuq (e.g. 4.3B(ii)). L-idea ta' *agro-tourism* hija tajba imma wieħed irid izomm f'moħħu l-karatteristiċi ta' din l-industrija. Dawk li jmorru għal dawn it-tip ta' turiżmu, ma jridux jaraw konglumerazzjoni u attivitajiet li jissuperaw l-industrija tal-agrikultura. Ma jridux ikunu ffullati, jew inkella jkunu f'ambjent li joffri aktar stress milli serħan. Il-mod kif dan qiegħed jiġi proġettat minn din il-policy tista' twassal li dan sejjer joqtol lilu nnisu qabel jitwieled. Ma hemmx kontrolli fuq il-	MEPA is mentioned. This includes its successors as per glossary. Grass blocks are preferable to concrete. New agro-tourism accommodation is limited to 60 tumoli of land and the buiding shall accommodate 7 to 10 rooms.

	mimimu ta' nies li jkunu hemm, ma hemmx kontrolli fuq il-karozzi jew attivitajiet oħra ta' tniggiz: bħal ħoss, dawl, nuqqas ta' biodiversità. Wieħed irid iżomm f'moħħuwkoll li t-turisti li jmorru għal dan it-tip ta' turiżmu huma familjari ma; attivitajiet professjonali f'dan il-qasam fuq meded akbar, u din il-policy ma tantx tidher li qed tixhet dawl fuq hekk. Il-biża' tiegħu huwa li wara li jingħataw dawn il-permessi għal din l-attività kummerċjali u din tfalli, ikun hemm talba għal *change of use*.	 Policy 1.2C safeguards this concern.
PART V	**ANIMAL SANCTUARIES, STABLES AND HORSE RIDING/SPORTS ESTABLISHMENTS**	
5.1.2.	Wieħed hawnhekk irid iżomm f'moħħu l-impatt ta' numru ta' annimali (bhejjem) f'dawn is-santwarji, u stallel. Dawn ikunu jridu firxa wiesgħa biex jiġru u ma jkunux iridu jinżammu l-ħin kollu fl-istallel. Dan ifiseer li dawn l-inħawi jkunu mbattma minnhom matul iż-żmien. Barra minn hekk wieħed irid ukoll jaħseb għall-iskart organiku tagħhom, kif dan jitnaddaf, kif dan jiġi miżmum fuq is-sit, kif jitneħħa, fejn jintrema, jekk ikunx qrib l-ilma li jwassal għall-ilma tal-pjan, jekk ikunx hemm limitu għal kemm annimali jistgħu jinżammu, kondizzjonijiet veterinarji dwar il-moħqrija, u impatti ta' traffiku ta' makkinarji li jġorruhom 'l hawn u 'l hemm. Hemm bżonn ħafna aktar dettalji u ppjanar u mmaniġġar tal-inħawi qabel wieħed jista' jiġġustifika dawn l-attivitajiet u l-impatt tagħhom, u jekk hemmx xi limitu għall-dawn l-attivitajiet. Wieħed jistaqsi xhini l-*carrying capacity* mill-aspetti soċjali, kummerċjali u ekonomiċi f'dan il-qasam. Barra minn hekk hemm ukoll obbligi tal-EU dwar in-nitrati u l-ilma li wkoll jindirizzaw dawn l-attivitjaiet u l-possibiltà tal-impatti negattivi fuqhom. Wieħed irid ukoll iżomm f'moħħu li pajjiżna huwa żgħir u huwa limitat għall-attivitjaiet bħal dawn. Bħala eżempju jekk għanda tażża li tesa' litru ma hemm ebda mod kif din nimlewha b'żewġ litri, għax l-anqas l-ewwel liltru ma jkun utli.	These are conditions which should be imposed on a case by case basis in planning applications. This is the reason why consultation with MRA is required. Stables shall be in timber precisely for this reason and to ensure reversibility.
5.1A	**ANIMAL SANCTUARIES**	
5.1A.(a)	Jiddispjaċini li għal darb'oħra terġa tispikka n-nuqqas tal-involviment tal-Awtorità għall-Ħarsien tal-Ambjent, issa b'mod regolari allarmanti. Hawnhekk ma nistax ma ngħidx li jidher biċ-ċar li l-esperti kompetenti f'dan il-qasam ma ingħatawx importanza li jistħoqilhom. U meta wieħed iqis li d-Direttorat tal-Ħarsien tal-Ambejnt issa wasal biex jagħlaq sena bla Direttur, wieħed ma jiskantax b'dan in-nuqqas serju.	Scheduled land is protected as per policy.
5.2	**STABLES AND HORSES RIDING ESTBLISHMENTS**	
5.2.1.(a)	Hawnhekk nixtieq nistaqsi jekk hemmx limitu għal dawn l-istallel u stabbilimenti oħra li jistgħu jingħataw liċenzja. U x'jiġri fil-każ li jkun hemm ħafna u wħud ifallu. Xi tkun il-pozizzjoni għal *change of use* tal-post.	As already stated, stables shall be in timber so no change of use may be allowed and reversibility ensured.
5.2.4(e)	Il-paragrafu li jiġi wara dan jerġa b'mod issa tedjanti jelimina kull referenza għall-Awtorità għal-Ħarsien tal-Ambjent.	This is an explanation para and not policy.

	Il-kundizzjoni li l-istallel taż-żwiemel iridu jkunu bogħod ċertu distanza minn *bore holes* ma jfisser xejn. Wieħed irid jara wkoll li ma jkunx hemm tnixxigħat li jwasslu għall-widien u għall-postijiet oħra fejn jinġema l-ilma tax-xita li jisqi lill-ilma tal-pjan.	Consultation meetings were held with the MRA prior to the policy.
	L-użu ta' *grass block for parking* sejjer iżid il-*footprint* tal-attività b'impatt negattiv ambjentali kif spjegat aktar 'l fuq.	Grassblocks allow the vegetation to grow and are preferable to concrete.
	L-aħħar paragrafu jsemmi *riding school, paddock* u attivitajiet relatati magħhom. Hemm xi rotot, distanżi u kundizzjonijiet fejn dawn jistgħu jmorru, aktar u aktar meta fid-dokument jissemmew passaġġi biż-żrar, bil-kokkos u passaġġi fl-għelieqi, jew wieħed sejjer iħalli li jinqalgħu l-inċidenti u mbagħad wieħed jara kif dawn jissolvew.	These shall be located within the curtilage of the stables on unscheduled land, and not anywhere as implied.
5.2.2.	Hawnhekk jissemmew wesgħat (*paddocks*) *where exercise areas are formed they should be surfaced in compacted soil.* U hawn irrid nistaqsi x'se jiġri mill-ilma tax-xita mniġġeż li jinżel fuq dawn il-wesgħat u li sejjer jinġarr 'l barra miż-żona, forsi anki sal-widien. U x'miżuri sejrin jittieħdu biex il-ħamrija ma tinġarx mir-riħ u mill-ilma tax-xita.	Consultation with the MRA is obligatory, as per policy.
5.2.3	L-approvazzjoni ta' *off road parking* huwa approvazzjoni ta' impatt negattiv fuq l-ambejnt, aktar u aktar meta ma hemm l-ebda kondizzjoni jew limitu sa fejn dan jista' jinfirex. B'esperjenza tal-mentalità lokali, sfortunatament anki dik politika, meta dan l-ambjent jiddegrada ruħu wieħed jgħid li ma għandux valur ekoloġiku jew soċjali aktar u għalhekk ma hemm l-ebda oġġezzjoni biex dan ikun jista' jiġi żviluppat.	This is an explanatory para and not policy.
5.2.6	Dan l-*off road parking* approvat sejjer iżid il-*foot print* tal-proġett u jkollu impatt negattiv kif spjegat f'5.2.3.	This is an explanatory para and not policy.
PART 6	**OTHER FORMS OF DEVELOPMENT OUTSIDE BUILT-UP AREAS**	
6.2	**Rehabilitation and redevelopment of existing buildings**	
6.2A	**Rehabilitation and change of use of exisitng buildings of architectoral, historical (not listed) vernacular or of other significance ODZ**	
8.2A(6)	Il-kondizzjoni li jintużaw siġar indiġeni hija waħda tajba. Biex din tkun konformi mal-obliggi nazzjonali u internezzjoni dawn għandhom ikunu mnissla minn eżemplari li jikbru Malta għall-raġunijiet kif spjegat aktar 'l fuq.	Noted.
	Fl-aħħar paragrafu ta' din it-taqsima tissemma **Awtorità.** Kif ikkummentajt qabel, ma hemm l-ebda definizzjoni ta' x-Awtorità hi.	MEPA and its successors as per glossary.
	Anki f'dan il-paragrafu jissemma l-bini tal-ħitan tas-sejjieħ bil-ġebel qadim tal-franka. Ara l-kummenti tiegħu fuq dan aktar 'l fuq.	Same as above.
6.2B	**Rehabilitation and change of use of listed buildings ODZ**	

6.2B.3	F'dan il-paragrafu jissemma **Department/Authorities** mingħajr ma hemm indikazzjnoin liema huma dawn. Jekk wieħed jimxi ma' dawn il-kliem mhux definiti fid-dokument, allura wieħed jista' faċilment jgħid li l-Awtorità għall-Ħarsien tal-Ambjent hija maqtugħa barra kompletament.	MEPA and its successors as per glossary.
	Fl-aħħar paragrafu jerġa jissemma l-użu ta' *grass blocks għall-parking.* Kif indikat qabel dawn iżidu l-*footprint* tal-proġett u għandhom impatt negattiv irriversibbli fuq il-biodiversità tal-post.	Same as above.
6.2C	**Redevelopment and change of use of existing buildings ODZ**	
6.2C.(6)c	Hawn jissemma l-*Agriculture Advisory Committee.* Bħal ħafna entitajiet oħra msemmija fid-dokument ma hemm l-ebda ħjiel jew definizzjoni ta' dan xhinu u minn min huwa kompost. Dan jista' jwassal kif il-viżjoni dejqa ta' dan il-Kumitat twassal f'deċiżjonijiet li jkollhom impatt negattiv fuq il-biodiversità u anki soċjali. Jista' jwassal ukoll biex jimbarazza Ministri u entitajiet uffiċċjali oħra fl-infurzar u l-amministrazzjoni ta' obbligi nazzjonali u internazzjonali, inklużi dawk tal-EU. Jekk wieħed jixtieq li d-deċiżjonijiet ikunu meħuda b'mod professjonali u trasparenti, dan il-kumitat għandu jkun rapprezentattiv minn dawk il-Ministeri u Awtoritajiet kollha li għandhom interss jew obbligi legali f'dan il-qasam.	Terms of reference of the AAC have been submitted.
6.2C.(7)	Hawnhekk jerġgħu jissemmew Dipartimenti / Awtoritajiet mingħajr ebda ħjiel ta' minn sejjer ikun involut u minn sejjer jitħalla barra.	Consultations shall be made on a case by case basis depending on the proposed use.
6.2C.(8)	Il-kondizzjoni li jintużaw siġar indiġeni hija waħda tajba. Biex din tkun konformi mal-obbliggi nazzjonali u internazzjonali dawn għandhom ikunu mnissla minn eżemplari li jikbru Malta għall-raġunijiet kif spjegat aktar 'l fuq.	Noted.
	Fl-aħħar paragrafu terġa tissemma **Awtorità** mingħajr ebda definizzjoni jew referenza ta' din minn hi.	MEPA and its successors as per glossary.
	F'dan il-paragrafu jisemma li l-ħitan tas-sejjieħ jistgħu jinbnew bil-ġebla qadima tal-franka. Kif spjegat aktar 'l fuq dan imur kontra Avviż Legali 160 tal-1997 dwar il-bini tal-ħitan tas-sejjieħ. Hemm xi ħsieb li din il-liġi tiġi revokata, jew li l-MEPA tagħti permessi li ma humiex konformi mal-bini ta' dawn il-ħitan? Dan ma jgħinx fil-qasam tal-ħarsien tal-biodiversità.	Same as above.
6.3	**Extensions to existing dwellings ODZ**	
6.3.(2)	Hawnhekk jispikka l-fatt kif il-biodiversità ma ngħatatx importanza f'dan id-dokument. In-nuqqas ta' referenza ta' *Special Area of Conservation* u *Special Conservation Areas,* li t-tnejn jagħmlu parti minn Natura 2000 tal-Unjoni Ewropea u li wkoll jistgħu jiġu affettwati minn dawn l-attivitajiet u żvilupp. Jiddispjaċini ngħid li dan id-dokument ma juri l-ebda ħeġġa jew	Scheduled land is protected as per policy.

	rieda jew viżjoni għall-ħarsien tal-ambjent naturali. Dan jitfa' dell ikraħ u anki sfortunatament tħassib fuq dan id-dokument meta l-MEPA hija l-Awtorità Kompetenti skont il-liġi biex tħares u tipproteġi l-ambjent naturali f'isem il-poplu.	
6.4	**Swimming pools**	
6.4(5)	Il-kondizzjoni li jintużaw siġar indiġeni hija waħda tajba. Biex din tkun konformi mal-obliggi nazzjonali u internazzjonali dawn għandhom ikunu mnissla minn eżemplari li jikbru Malta għall-raġunijiet kif spjegat aktar 'l fuq.	Noted.

Bħala nota ġenerali jiddispjaċini nirrimarka li l-miżuri għall-ħarsien tal-biodiversità huma minimi, u l-faċilitajiet għall-attivitajiet kummerċjali jieħdu preferenza, bi prezz moħbi (*externalities*) li sejjer jitħallas mill-ambjent naturali u soċjali. Ngħidu aħna, f'dokument daqshekk importanti għall-biodiversità, il-kelma biodiversità ma tissemma qatt, minkejja li l-*Outside Development Zone* hija l-parti l-aktar sinjura fil-biodiversità Maltija.

Barra minhekk in-nuqqas ta' referenza għall-Awtorità għall-Ħarsient tal-Ambjent hija wkoll indikazzjoni li ma hemm l-ebda viżjoni, biex ma ngħidx interess, f'dan il-qasam. Il-fatt li id-Direttorat sal-lum il-ġurnata għadu mingħajr Direttur, issa għal kważi sena, u l-fatt li dan jinstab f'Ministeru ieħor li mhux tal-Ambjent, ukoll ikomplu jħassbu lill-ħafna li l-qasam ambjentali mhux ta' priorità għal Ministeru li qiegħed fih, aktar u aktar meta l-MEPA għadha l-Awtorita kompetenti f'dan il-qasamu, u li hi ħejjiet dan id-dokument.

DHL COMMENTS	MEPA COMMENTS
1) The new ODZ policy has been approved by MEPA without the Strategic Plan for Environment and Development first having been completed which should give overall strategic direction to the necessity or otherwise of this policy. None of the studies that should accompany this document have yet been published or made available to the public.	The objectives of the ODZ Policy (and all other policies) were issued by the government in line with the SPED.
2) There are 14 activities for which development can be permitted through the new ODZ policy. The cumulative impact of these 14 policies has not been studied or measured, in particular their impact on land use and location in relation to each other and to their number which, like the SPED does require a Strategic Environmental Assessment. We refer to new buildings or redeveloped/converted buildings for • wineries • olive oil production • bee keeping or honey processing • farm dwellings • agricultural stores • farm shops • agritourism accommodation and swimming pools • animal sanctuaries • slaughterhouses • reservoirs and pump rooms • greenhouses • stables and horse riding facilities • extensions to existing ODZ developments • swimming pools as well as adaptation to new use of historic or scheduled buildings lying in ODZ.	All the developments, except for the animal sanctuaries, were permitted through the Agriculture, Farm Diversification and Stables Policy or through the PLP 20 or through the Swimming Pools policy ODZ. The new use of a scheduled historic building ODZ with conditions shall ensure that the historic aspect of the building is not compromised (refer to the policy 6.2B).
3) The cumulative impact of these 14 potential development activities has not been measured in addition to the overall impact on land use of other recent development proposals made by Mepa that are also to take place in ODZ. We refer in particular to proposals for • firework factories, • petrol stations, • shooting ranges • community led initiatives (schools, sports facilities etc)	Noted.
4) There is no indication as to the number of permits that can be issued for any of the activities regulated by the policies or their distance from each other. We strongly recommend that studies be carried out before ad hoc permitting is allowed. Malta being a free market could end up with numerous piece meal developments closely	This comment is not a policy issue but of a local planning nature.

located that will create entire new urban areas.	
4) The responsibility for environmental protection is not very clearly defined in particular in the definition of protection to be given to areas of high landscape value, high ecological value. Furthermore the policy does not give protection to buffer zones to Level 1 and Level 2 scheduled areas in which all of the above 14 activities can potentially be permitted. In light of the fact that the Environmental Directorate is no longer going to sit within MEPA we ask that this responsibility and that of the Environment Ministry is clearly defined as well as the impact of the same entities on the decision making process for the permitting of developments in rural areas.	Buffer zones for archaeologically scheduled areas have been included in the policy. With regards to the Envirnmental Directorate this has been explained to the NGS's in a recent public meeting. The Environment shall be represented on the Planning Board.
5) Historic Buildings are not covered by Guardianship Deed: We believe that granting for commercial purposes or for the purposes covered by this new ODZ policy, of all scheduled buildings, or others which still have to scheduled (4.4(3),6.2a AND 6.2b) and others as may be found worthy of protection for their historic or architectural merit should be governed by a Guardianship Deed as required by the Cultural Heritage Act. Commercial entities entering into leases with government or any other form of contract of use should be given the same responsibility and onus governing the use of scheduled sites as laid out in the Cultural Heritage Act.	Noted. This is not a policy issue.
6) Design guidelines. We believe the new policy does not give adequate direction to the characteristics that buildings in rural areas should follow. This may result in inappropriate styles being utilized that will change the quality and character of Malta's traditional rural buildings. We wish to ask who will be monitoring this quality and who will be setting the guidelines.	The policies state that a building has to respect the rural environment where it is sited and to respect the visual context. This is apart from the fact that recycled stone shall be used for the development. This issue shall be analysed by the case officer when preparing the report for the decision.
8) There is no mention of the maximum heights or number of floors buildings in rural areas are to be permitted. If Floor Area Ratio can be applied, this will mean that buildings of more than two floors may be permitted.	FAR shall not apply in ODZ areas. Also sometimes two floors are preferable to one depending on the context of the site.
9) We believe the areas allowable for swimming pools to be too generous in light of the permanent damage inflicted to land from excavation for such amenities in particular in the case of agritourism complexes 4.4.1 which states floor space for buildings can be up to 200sq m, but up to 400 sq m with swimming pools.	The total areas considered for swimming pools with their ancillary facilities (eg paving, showers, reservoirs etc) have not been changed from the existing policies.
10) External ramps to basements should <u>not</u> be permitted for all the activities regulated by the new ODZ policy. We note that the restriction to disallow external ramps has been waived for new farm dwellings for livestock farmers,(Policy 2.2a) for agricultural buildings for livestock farmers (Policy 2.3) and is not strictly curtailed for extensions to existing dwellings. (Policy 6.3)	The scope for removing the external ramp in the cases of farms because the machinery may be stored/parked in the basement therefore a ramp is necessary, while in the case of permitted dwellings then parking is visually intrusive outside the curtilage of the building.
11) Greenhouses: We believe the policy is written so as to still allow possibility of laying concrete or permanent impermeable flooring, in 2.6.3, where it is stated that in	The paragraph 2.6.3 is not the policy. However the sentence after the one quoted clearly states that

some instances the method of operation of a greenhouse may necessitate the requirement of a permanent impermeable flooring. We believe this allows potential abuse and the whole sentence should be struck out of the policy and the possibility eliminated.	justification would be required for the impermeable flooring and this has to ensure reversibility when no longer required.
12) The new ODZ policy is not clear on changes of use of new or converted structures allowed by this policy should the use for farming activities or others as allowed by these regulations come to an end. It needs to be clarified what will happen to these structures if they do not 'continue to operate' for the purpose for which they were built or converted.	Policy 1.2C refers to such situations.
12) We find the permitting of a 10% tolerance 'as a flexibility extension' to the total area permitted for each activity to be potential for abuse. In the light of the fact that development always uses up more external space than allowed due to transport, excavation waste, accumulated debris, this 0.22 clause in the Introduction Review of this Document should be struck off.	The 10% tolerance is capped at 15sq.m. regardless of the size of floorspace.
13) There is no mention in the guidelines nor any recommendations for the proper disposal of debris generated by construction activity and although these conditions can be imposed on a case by case basis with the granting of an application we consider the maintenance of the countryside and its amenities to be so important as to warrant a set of rules to govern good building practice within this policy itself.	Agreed. This would be a condition in the permit and could be tied to a bank guarantee.

MALTA RAMBLERS' ASSOCIATION VIEWS ON NEW ODZ POLICIES	MEPA COMMENTS
1. PREMISES 1. 1 This document (both versions) suffers from the same flaw as all other policies: it was drawn up before the SPED. Indeed a document should have been drawn up dealing only with ODZ; in a holistic not piecemeal way. This latter obviously obfuscates the raw deal ODZ is getting, because one tends to forget that besides the littering with small rooms and dwellings this document will be permitting, one has also to pack in fireworks factories, shooting ranges, cemeteries, fuel stations, solar farms, extensions to quarries, etc. Only when one gets the overall picture will one be able to assess the huge blitz that the ODZ is going to suffer	This issue does not effect the ODZ Policy and Design Guidance. The objectives which were issued for public consultation were given to the working group by the government and in line with the SPED.
1. 2 Reading this document makes one doubt whether there were any real environmentalists on the panel which drew it up . This doubt stems from the fact that, as Alfred Baldacchino points out very cogently in his submissions, no mention was made of the *Aworità ghall-Harsien tal-Ambjent*, no references to SACs and SPAs (in the first draft. The Glossary needs to be updated with these terms.), and Biodiversity is given very short shrift. There were no clauses regarding water storage and protection; again all these were included only in the second draft. And still, even in the second version, no provision is made for the roofs of all the new permitted constructions to be used as water catchment areas, attached to cisterns or reservoirs.	The MEPA Board approved version includes The Authority in the policies. This entity is defined in the glossary. Re water storage the policy states that notification only is required. This has been introduced in order to facilitate water storage applications.
1. 3 No references are made to studies and statistics carried out before drafting the document. It is all very good that perit Elizabeth Ellul points out that a huge pile of studies was consulted, but if one has to justify the needs of all these buildings being permitted one has to qualify and quantify the needs if one is to be credible. E.g. are the needs of agriculture and animal husbandry, and their products, in tune with the island's need of water? If not, how is one to judge whether any project is viable or cost-effective, even in environmental terms, or whether any provision really necessary and the needs claimed realistic. As things	One has to remember that this document is primarily a revision of the existing three policies and it is very clear in this comment that there is no knowledge of the existing policies. This document is NOT a new policy document. It should be noted that visitor attractions, farm retail and other buildings all formed part of the existing policy document, namely the Agriculture, Farm Diversification and Stables Policy which is being used presently in determining planning applications. In fact for example an existing policy states that an abandoned farm can be redeveloped

stand most of the suggestions can be exploited by too many applicants: retail rooms, visitor attractions' …. buildings, etc. Indeed, the document gives the impression it is just a list of wishes expressed by several individuals, and that with this document one has just tried to please everyone; all at the expense of ODZ, the public's space.	into a new dwelling ODZ (refer to AFDS Policy 2.3D (5)). The new ODZ policy gives the possibility to the agriculture sector to diversify in line with the EU 2020 policy for agriculture. It will be the remit of the Dept of Agric to assess the real need for development on the basis of its policy, expected to be published.
1. 4 We do not feel we owe any apologies for repeating things said by others; these are not repetitions; they are statements meant to underline that these are beliefs that most other eNGOs hold dear.	There is no need for an apology. In fact Ramblers Association had already submitted their comments during the public consultation period, although late, and the comments were considered by the working group.
2. LACUNAE AND FAULTS OF BOTH DOCUMENTS 2. 1 Nothing is said about what MEPA intends to do about repairing the damage done to the ODZ in the last 20 years. This includes the absolute lack of Enforcement, an abdication on the part of MEPA of its Mission statement. And yet these two documents lay strict conditions for most of the permits and say that MEPA or some other Authority will monitor these. It takes a giant dose of optimism to believe that this will be done when they are some 9000 Enforcement Orders (of which only some 5,000 are still Enforceable Orders) for the MEPA to deal with! And again no mention is made as to how the Enforcement Directorate is to become effective. This is just either a wild hope or else sop to the environmetal NGOs. For has the MEPA obtained the funds and the human resources for this miracle to happen? Or is one to say that even the MEPA has a sense of humour?	This comment has no relevance to the ODZ Policy document, except maybe in Policy .12C which states that "Any building permitted by this policy document which is not used for a period of three consecutive years within thirty years from the date of issue of the permit, and/or is not used for its permitted purpose shall be demolished at the expense of the owner."
2. 2 There are too many (over 40 instances) "may be granted", "may be permitted", etc. creating wide loopholes for anybody who can read.	This implies that permission will be based on an assessment of the proposal.
2. 3 There is a reference to a seemingly phantomatic "Agricultural Advisrory Committee" (v. Also Alfred Baldacchino's submissions)	Terms of reference for this committee have been submitted.
2. 4 There are numerous references to an "Authority" without specifying which. This is a worrying omission which should be rectified.	"Authority" has been defined in the glossary as MEPA and its successors.
2. 5 Given this multitude of buildings why is it	This issues is treated on a case by case basis and is

never stated that these have to collect rain water in a cistern or a reservoir?	a condition in permits.
3. OBJECTIVES AND ABSENCE OF REAL MEASURES TO ACHIEVE THEM. 3. 1 The objectives (1.1.1) themselves could have been written by Saint Francis himself but then there is hardly any commitment to any of these objectives in all the document. Unless of course one considers buildings, reconstructions of buildings, extensions of buildings, conversions of buildings, swimming pools, rubble walls of 'tal-franka'; etc as the real solutions needed.	This 1.1.1 is a replica of 1.3.2 in the existing Policy document Para 1.3.2.
3. 2 1.1.1 "To support….the essential and genuine needs of sustainable agriculture and rural (i.e. ODZ) development…etc." Yet the only support offered is one: buildings, more than 15 types of buildings or extensions to building or development of building): dwellings, constructions for various types of use (oil presses, bee keeping, storage places, slaughter houses, retail outlets, boutique wineries, visitors' attractions, stables, pump rooms, etc. then there are reservoirs, greenhouses, swimming pools, etc.). One should like to believe that those who drew up this document really believe they will achieve any of the objectives they set through this ravage of the countryside. Suffice it to say that in the first document words like Agriculture, Countryside /Landscape, Sustainable/ability and Biodiversity recur less than 100 times and very rarely accompanied by remedial measures. While words like Development, Building/s, Accommodation, Rehabilitation, Conversion occur some 400 times. These simple statistics say it all.	It is recommended that one views the existing AFDS Policy document on which present recommendations and decisions are taken in ODZ. This document is a document which regulates "development" and planning permissions in ODZ, and this is the reason why such words are mentioned.
4. QUESTIONS WHICH CALL FOR AN ANSWER 4. 1 Some dates need to be explained otherwise they could arouse suspicions: 1978, 1994, 2004	These dates have been considered as follows: 1978 – clear aerial photos and survey sheets of Malta and Gozo, 1994 – licences issued for farms, 2004 – cut off date when lanes were built by Govt (EU membership).
4. 2 Thus the word 'Authority' on its own always refers to the MEPA? E.g. Glossary: "Abandoned Agricultural Land: Where such land has become characterised by species of wild flora, the Authority must determine whether the land qualifies as a natural habitat, an important habitat of	As explained above the Authority is MEPA and its successors.

wild species or an ecological corridor. " Which Authority? Surely this must be the Environment Protection Division still to be set Up, not the Planning Division, to decide this. Hence a more specific indication is necessary.	
4.3 Where certain locations are precluded, e.g. those of Ecological, Scientific and Archeological, would it not be better if Ecological sites are mentioned specifically: Natura 2000 sites, SACs and SPAs, etc? Reference should be made to Policy 1.2G and its explanation.	Noted.
4. 4 Why has the word "clearance" been substituted with "consultation" in all cases but one? As if "consultation" has ever meant "agreement". Has the last word always to remain with the Planning arm of the MEPA?	Clearance had been substituted with consultation because there may be a situation where a consultee may not give the clearance to a proposal in the consultation. It is then up to the deciding body to weigh this.
4. 5 Land for Agricultural use: (Policy 2.8) "The conversion of non-agricultural land for vine-…" Would it not be environmentally more prudent to allow the invasion of garigue or steppe only if there are no other abandoned or derelict agricultural land in the region?	Agreed. In fact this policy safeguards these areas in Policy 2.8(1), i.e. the para below.
4. 6 Why are penalties for not complying with the regulations and conditions never referred to in any of the policies?	The reason is that Policy 1.2C safeguards this issue, and also this would be a condition in the permit on a case by case basis.
5 CHANGES FROM FIRST VERSION OF THE POLICIES TO THE SECOND 5. 1 Some were indeed very positive, such as the ones regarding the safeguarding of our water sources and the inclusion of a reference to SACs and SPAs already referred to (1.2G). So whenever certain locations are precluded the reference should be to Policy 1.2G. But one asks: why were not they included in the first version? Does the question sound like a rhetorical one?	This is precisely why public consultation is carried out. These were changes which were made after the public consultation period.
5. 2 So were the additions of " max of 5 years and the land reinstated to its original State without any reimbursement" AND "at the expense of the owner" in 1.2B and 1.2C respectively. But then one has to ask why this clause has not been	Policy 1.2C safeguards this issue. Nothwithstanding, safeguards have been made in policies to tie ownership with use, such as farmer's dwelling with the livestock farm. Also specific conditions will be imposed on a case by case basis.

added to ALL buildings being permitted here; especially those built for Agriturism purposes and ALSO ALL DWELLINGS, if they no longer serve an agricultural purpose,	In the case of Agro tourism, the farming enterprise is legally tied to the accommodation as one unit.
5.3 In article 1.2.1 "The Authority will ~~seek to~~ safeguard (v.1.2 I) traditional pathways, the "seek to" has been very rightly deleted. It is the duty of the MEPA to do so. And we read with satisfaction the addition of Policy 2.10 (4) Footpaths… shall be created to facilitate access to the public. But then in 1.2 H "Protection of Landscape features: will seek to conserve… will seek to establish a legal management agreement", the "seek to" has been retained when it is a duty of the MEPA (in its still undivided form) to do so.	Noted. This has been transposed from the previous policy document.
5.4 We also view Policy 5.1A (b) re Animal sanctuaries having to be at a distance (200-300m) from the boundary ODZ boundary as very sensible. Allow us to point out that "amenities" as used in the last line of this policy does not seem to match with the definition of the word in the Glossary.	Amenities is not defined in the glossary.
5. 5 Buildings for Beekeeping, (Policy 3.4A C) In the first version the farmer had to have "at least 150 registered bee colonies". In the second version this number has been reduced to 50. The reduction is so drastic that one would be forgiven to suspect that someone is going to be made happy.	This amendment has been made because it is the realistic value.
5. 6 Positive also is the deletion of Policy 2.3B re relocation of livestock farm in an Intensive Agricultural Area. Still, this should never have been allowed in the first place.	Noted.
6. DAMAGING POLICY WHICH HAS BEEN ADDED: 6. 1 2.2A Farm Dwelling (5) " the proposed (New Farm Dwelling for Livestock Farmers) has a maximum floor space of 250m^2 ". Our Association is not only against this addition, but also against the fact that such large floor space is allowed without	The dwelling for the livestock farmer within the boundary of the farm (i.e. within the walls of the farm) has a maximum floor space of 250sq.m. to encourage the young farmers to live there and

specifying whether this is for a farmer with 50 tmiem or even with just one tomna (1124 m^2); i.e occupying almost one fourth of the farm. One could answer "But this is subject to consultation with…etc". Apart from the fact that Everybody knows what consultation is usually taken to mean; and apart from the fact that the Named Agricultural Advisory Committee seems to be a somewhat phantasmagorical entity. The least one could do is establish clear parameters which do not need "consultations". As for the "construction of a single dwelling unit outside the boundary…" our objection is even stronger. But, as we feared it has been retained.	continue the livestock farming when they get married. One must distinguish between livestock farming and arable farming. The policy which allows, at present, the construction of a new dwelling for the arable farmer has been removed from this new document. There is no need for the arable farmer to live adjacent to his crops. However in the case of the livestock farmer, it is imperative that he lives within the farm. Livestock require constant attention and this is the reason why the farmer has to be close by. In cases where there is no space within the farm, then the dwelling has to be outside the boundary, but with a smaller floor space.
7. DAMAGING PROVISIONS WHICH HAVE BEEN RETAINED 7. 1 We absolutely disagree with the idea of NEW FARM OUTLETS. If everyone who qualifies for these $15m^2$ outlets asks for it, one can easily imagine what a deleterious effect this littering the countryside with these 'cubes' will have. Moreover it will neither benefit the farmer nor the consumer; both are having a better deal with the idea of farmers' markets. It is a version of the one stop shop. Besides, the document says nothing about what will happen to these rooms if they stop operating as permitted.	It is not any farmer which qualifies for the farm outlet but a farmer with 10 tumoli of consolidated land. Policy 1.2C applies.
7. 2 Nor do we agree with the idea of VISITOR ATTRACTIONS when there is no Clear definition of what these are, how they qualify to be considered such.	Visitor attraction, as its name implies, attracts the visitors to the farming enterprise. It is not a new building but a change of use of a permitted building, with conditions, and is explained in the para below the policy.
7. 3 Nor do we agree with the Extensions to existing dwellings in ODZ (Policy 6.3); there are too many uninhabited buildings all over the island that can serve these needs. God forbid all who qualify were to apply for this.	This policy, a revision of the existing policy PLP 20, relates to permitted dwellings ODZ.
8. VACUOUS PROVISIONS 8.1 Greenhouses : 2.6.1 "provided that the impact on the environment is minimised! We appreciate that in many cases greenhouses are very necessary. No one will however deny that we cannot	Safeguards to environmental considerations have been made in para (4) in the Greenhouses policy.

go beyond than a certain limit in covering our agricultural land with plastic. The studies done should have made this clear. Will MEPA be make public the provisions needed to mitigate the impact of greenhouses on the environment? Apparently no knows any, except for lowering their height; which is something, but not much really.	
8. 2 Rubble walls, Policy 2.9 (5) "existing rubble walls shall be maintained (repaired) according to established Legal Notice/s" – These LNs have been there for years and rubble walls have crumbled and remained so. Who is going to see to this enforcement for past and future non observance of the LN, and for the relative fines if any. One positive measure thing that could have been added here: what financial or other assistance the MEPA will be offering the farmers to see that this is done.	No planning application is necessary to maintain/repair these walls.
8. 2.1 The document says that the traditional stones for rubble walls are no longer available; but if hundreds of kilometres of these have been demolished for fields to become houses where have all those stones surrounding them ended up? This just offers an easy way to anybody facing this problem, and certainly does not boost MEPA's image as an efficient preserver of our heritage. Allowing "Randomly cut franka" for new rubble walls is a nonstarter. It is not a solution; in all cases it will be a scar. And we do not think there is anybody who does not know this. So we are particularly irked by the proviso: "provided this does not lead to visual or environmental impact". We do not know of any case when this impact is not negative, nor of any other way to avoid it except that of using the proper stones. 8. 3 Agricultural stores Policy 2.5A (6): "Such additional storage requirements shall have the form of light/demountable structures…". Apart from the difficulty of defining 'light', and that 'demountable' should mean that they ARE actually demounted after a relatively short period, everybody knows that such structures tend to become permanent. Not only, after a short number of years it is not impossible that the MEPA itself will allow these structures to be in stone because they have been found most beneficial.	It is assumed that this comment is based on studies and statistics. Otherwise it cannot be founded. The policy states "random-sized irregularly shaped *franka* stones (recycled from demolition)" and not as stated in the comment. Also, when these stones were created in the first instance they were freshly cut, so why not now. With appropriate justification, these structures shall be permissible to assist the genuine arable farmer in his/her production.

8.4 Wind-driven pumps: Policy 2.7B . This addition tells us that "Existing dilapidated wind-driven pumps CAN be restored/replaced". Why 'can'? Was there any prohibition of restoring or replacing? Or did this need a permit? Again this is a clear case where the MEPA could really have done something for agriculture by offering financial or other assistance in restoring or removing these structures.	Noted. With this new policy, these can be restored/replaced without the need for an application, let alone a refusal.
9. AGRITOURISM. We have heard contrasting ideas about their suitability and feasibility in our small islands. We will limit ourselves to flaws, could be loopholes, in the Policy 4.4.	Noted.
9.1 In the first place one would expect to find what will qualify as an Agritourism site: e.g. minimum area of tenement, number and variety of animals, minimum and maximum number of rooms for customers, kind of activities clients could be involved in, even the maximum number of such sites that will be allowed might be very imporant, etc.	The policy 4.4 is clear in what can be allowed in terms of floor space, number of rooms etc.
9.2 The document envisages four types of this development but there is no consistent policy as to the requirements for each type. For example: • Does the 60 tumoli apply for all 4 types or only for that regarding the fourth type. If only for the latter, why is there no provision for the other three?	The approved MEPA Board policy states that the 60 tumoli apply for the new construction.
• For type 4 development it is stated that these have to accommodate 7-10 guest rooms. We believe this even ridiculous given that it is more than what is commonly the practice in Sicily, an island eighty times our size. But what about the rooms allowed for the other three types?	The values stated have been made in consultation with the Malta Tourism Authority.
• Is there any reason why in some cases the building is of a maximum of $200m^2$ and for another type one allows a huge $400m^2$?	A max 200sq.m. for cases of redevelopment in an existing operational farm, while the 400sq.m. is for the new agro-tourism.
• It is not always stated that the farmer should be registered; and is a registration 'part-time' good enough?	Consultation with the Agriculture Dept shall be made. It is not uncommon that a part-time farmer produces more than a full-time one.
• The farming activity must have been in operation for 5 years (type 4); in type 2 this is to be	In type 2, the permitted building is already there and this involves the redevelopment/change of use.

determined by some Authority; does not this sound suspicious? And does 'established and continuous' mean 'over five years'?	Type 4 is a totally new building.
• Are all four types allowed to have a swimming pool? Of the same size?	Case by case basis.
• More important than all these: what happens to the new, redeveloped, consolidated buildings once they are no longer providing the service they were permitted for?	Policy 1.2C applies.
CONCLUSIONS 1. This document claims to be helping agriculture: it does so only through the construction of what could be a multitude of horrid little rooms; and this without solid proof that serious studies have been conducted to establish their real need. What really stands out is that the most fruitful submissions and consultations were those by and with individuals who had vested interests.	
2. The countryside, our landscape, is going to get yet another very raw deal as it did with the 2006 Rationalisation exercise.	