



Rural Policy Design Guidance 2020 Second Phase - Representation by Moviment Graffiti

Moviment Graffiti stresses that it is vital that any updates to the Rural Policy Design Guidance are done in line with a new Strategic Plan for the Environment and Development (SPED) and national environment objectives. The Rural Area should be an escape from urban life with less buildings and dereliction. The following points require further clarification or amendments in the policy so as to avoid future loopholes.

General, Using this Document and Policy

Under this section, there must be a highlight on the importance of food security and landscape mitigation.

General, Using this Document and Policy, and Policy 8.1: National Policy Projects

*“When the Authority is required to assess an application for development permission which involves a project of **national interest**, such projects may require a departure from the policies and principles established in this Document.”*

*“Any project of **national interest** arising from National Government Policies which departs from the policies formulated in this document shall be assessed on its own merits subject to consultation with the Departments/Authorities/Committees concerned.”*

The term “*national interest*” used in the above two clauses is too broad. What developments fall under the category of “national interest”? Can private projects by private entities, such as the American University of Malta (AUM), be considered as projects of national interest?

“*Project of national interest*” should be limited to wholly public projects that serve a public interest. In the determination of whether a project serves a public interest, Government is to engage in a broad public consultation exercise that goes beyond the collection of online feedback.

Moreover, the term “*National Government Policies*” should be qualified since, as is, it renders this policy subordinate to all other Government policies.

Policy 8.1.B: General Design Principles

“In the case of dwellings permitted by this document, amenities and ancillary facilities for the enjoyment of the dwelling may be considered provided they are located within the curtilage of the property without significant land uptake, can be reasonably accommodated without adverse impact on the site environment, contribute to the achievement of the objectives of this policy and comply with other relevant policies in this document. Such amenities include animal enclosures, reservoirs and swimming pools with deck areas provided they do not exceed a footprint of 75sqm.”

- The word significant is vague and subject to many different interpretations.



- It is not clear whether the 75sqm would be allowed for each amenity or if this is the total area for all amenities. This should be clarified.
- A reservoir should be allowed to have an area greater than 75sqm if this is built and used conjunctly by a number of different farmers.
- Swimming pools should not be allowed in rural areas and it should be specifically mentioned that they are prohibited by this policy.
- Reduction of light pollution should be mentioned in this policy and should be in line with the “Guidelines for the Reduction of Light Pollution in the Maltese Islands”

Policy 8.1.C: Abandoned Buildings

*“(ii) In case of legally established buildings, the Authority may apply the provisions of (i) above or grant permissions for a **limited period of time** for those development which it deems to have a defined utility period and require cessation of operations, dismantling of buildings and structures and re-instatement of the site to an improved condition.”*

This clause should be clarified or removed completely. Why is the Planning Authority being given permission to allow the development of degraded, derelict and abandoned legally established buildings for some time? What is this “limited period of time”? The Planning Authority should focus on enforcement and the removal of injuries to amenity in rural areas.

Policy 8.1.D: Soil Conservation and Monitoring

“By ordering the controlled re-use of soil within the same arable holding, and as a last resort, the relocation of the said soil.”

This is a needless restriction on the agricultural farmer.

Policy 9.1.A: New Farm Dwellings for Farmers

200sqm is excessive for new dwellings. Policy should focus on the restoration of existing structures and prohibit non-essential ancillary facilities like swimming pools. This clause is an invitation to develop villas with swimming pools in rural areas.

Livestock farmers should be allowed a dwelling of a maximum of 60sqm, provided that there are no existing dwellings and they have been registered as farmers for the last 5 years with a financial turnover of a specified minimum amount.

Agricultural farmers should be allowed very small-scale toilet facilities, and compost toilets should be encouraged. They would have to be registered as farmers for the last 5 years with a financial turnover of a specified minimum amount. This should be done to prevent “fictitious farmers” from registering as farmers by just owning the land.



Policy 9.1.B: Development on Livestock Farm Units

There should be a size limitation for these livestock farm units.

Policy 10.1.A: A building for boutique wineries, olive oil and honey processing

The development of wineries in rural areas should not be allowed. A winery is a factory and hence it should be located in an industrial area. Harvesting of grapes is only carried out once a year, hence grapes can be harvested and transported to the winery on the same day since distances in Malta are short. The same applies to olive oil processors.

Policy 11.1.A: Farm retail outlets

It should be specified that the retail outlet is to sell exclusively local farm produce from one's own farm, as otherwise this may result in the proliferation of shops that sell other items unrelated to the local farm produce. The sole aim of these outlets should be to promote local produce.

Policy 11.1.D: Tourism Accommodation on farm holdings

Tourism accommodation in rural areas should be prohibited. Guesthouses and hotels in rural areas, even if related to agrotourism, do not make any sense in the Maltese context. Our rural land is precious and anyone who would like to enjoy it can sleep overnight in the urban area and then take day trips, since the distances are very short. If we allow the proliferation of tourist accommodations on our scarce and precious rural land, both tourists as well as residents will have nothing left to enjoy.

The only tourist accommodation that should be allowed is that on existing farm dwellings of genuine farmers, where they can rent rooms in their own dwelling.

Policy 12.1.B: Animal Enclosures

This policy should be amended to exclude the development of zoos and animal enclosures for exotic animals. There is absolutely no reason to have zoos in Malta since they are not educational and they change the character of the rural area.

Also, stables that are not commercially viable should be prohibited.

Policy 13: Restoration and Redevelopment of Rural Buildings

- This policy includes terms such as “*sustainability and innovation*”, “*research and innovation*” and “*nature appreciation*”. This wording is too vague and creates loopholes for the redevelopment and change of use of structures that is not in line with the character of the rural area, since these terms are totally subjective and can be loosely interpreted by the Planning Board/Commission. The goals of restoration or redevelopment should be in alignment with the Sustainable Development Goals (SDGs), resulting in tangible and practical outcomes.



- **Policy 13.1.D** allows for extensions to dwellings in rural areas up to 200sqm. This area is excessive and would potentially lead to numerous villas in the rural area. Also, it is not clear if this area is inclusive of the 75sqm pool-area or otherwise..

General Comments:

The policy makes no mention of the much-needed water resource management. We suggest that a new policy is drafted on this topic.

Agritourism (without accommodation) can be allowed on the conditions that the structures are temporary, with an aesthetic that blends with the rural environment and having a floor space of not more than 25sqm. The use of compost toilets should be encouraged.