

**Rural Strategy Topic Paper
Draft for Public Consultation
Response to Comments
March 2003**

Public Consultation Meeting in Malta held on 20th August 2002

Item number	Summary of Comments	Directorate's Response	Amendment
1	<p>Mr. Godfrey Camilleri, Department of Agriculture</p> <p>Every agricultural sector must be looked at very carefully especially for future use. Problems connected with farms:</p> <ul style="list-style-type: none"> ▪ some farms are difficult to move or relocate; ▪ there is no policy that describes what happens to farm buildings when they will not be in use anymore; ▪ some of these farms are unfortunately very close to industrial areas and thus their next use will probably be industrial. 	<p>The problems connected with farms represent an important issue and will be addressed in the new Structure Plan. These are in general addressed by the Rural Strategy Topic Paper, which also suggests that abandoned and existing agricultural buildings ODZ do not create justification for accommodating non-legitimate development in rural areas.</p>	<p>No change</p>
2	<p>Mr. Clement Azzopardi, Farmers Central Cooperative</p> <p>Agree with MEPA giving out conditions on greenhouses. It is being suggested that MEPA comes up with a plan for 40 to 50 tumoli of land where farmers could develop their greenhouses.</p> <p>Countryside recreation conflicts with farm activities; it is suggested to promote a better culture amongst the public to appreciate the farmer's work and his products.</p>	<p>MEPA believes that the demand for greenhouses is not concentrated at any particular location on the Islands, which implies that allocation of the extent of land proposed at a single location is unlikely to address the issue. It may be noted that the Draft Gozo and Comino Local Plan has already identified areas where greenhouses may be accommodated.</p> <p>Provision for countryside recreation should also look at the control and education of visitors (through visitor management). Visitor management is intended to enhance people's enjoyment of the countryside and increase visitors' appreciation of</p>	<p>No change</p>

		activities like agriculture. The Rural Strategy Topic Paper tackles this issue.	
3	<p>Mr. Clement Azzopardi, Farmers Central Coop</p> <p>Mr. Azzopardi owns ½ tumolo of land and said that it does not make sense to have conditions on screening of greenhouses (usually through planting of trees): landscaping reduces the function of greenhouses.</p>	There are various land uses and activities in the countryside that conflict with each other. Screening of greenhouses is often used as a measure to mitigate the impact of greenhouses on the rural scenery.	No change
4	<p>Mr. Godfrey Camilleri, Department of Agriculture</p> <p>Screening of animal farms discussed. Given that our countryside is small, screening of farm buildings is important so as to reduce impacts on other industries.</p>	Valid point. Screening (including the use of landscaping) of buildings and structures usually helps in minimising some of the conflicts in rural areas. Introduction of other important design elements also helps in securing mitigation of visual impact of development, which may include the use of appropriate colours, materials, textures, apertures, fittings, etc.	No change
5	<p>Mr. Andrew Muscat, Malta Agricultural Lobby</p> <p>The way forward of the proposed strategy is important. The strategy is nice but it needs financing; considering that it is run by policies, some sort of lobbying is required to get the necessary financial support.</p>	The implementation of the proposed strategy is expected to rely on cooperation between the various departments/agencies in dealing with problems in rural areas. It is important therefore, that the strategy is viewed as complementing the Government’s emerging Rural Development Plan. The Rural Strategy Topic Paper and the Rural Development Plan however, are meant to serve different functions but the grounds covered to some extent are complementary.	No change

6	<p>Mr Patrick Scerri, Delicata Winery</p> <p>St. Andrews area needs to be managed better. A school will be developed in this area; this development will occupy around 2.2 hectares of agricultural land. Included in the Coastal Plan and includes a park for small garages (UNCLEAR COMMENT).</p> <p>Fragmentation of land and issues connected with the farmer's insecurity over the land hinders protection of agricultural land.</p>	<p>The development issues affecting the St. Andrews area have been closely examined, as part of the preparation of Local Plans, and it is not the usual function of a Topic Paper to deal with site-specific issues of this nature, whilst it is accepted that fragmentation of land holdings and insecurity issues may affect (indirectly) the protection of agricultural land. The resolution of these issues lie outside the scope of the Development Planning Act and the planning system.</p>	<p>No change</p>
7	<p>Mr Carmel Baldacchino, Farmers Central Coop</p> <p>Consolidate the public opinion towards space and agriculture and possibly start at a younger age by education campaigns.</p>	<p>Agree that education on agriculture and the efficient use of land with particular reference to people of young age is important. The Authority has undertaken several educational initiatives with respect to protection of the environment and the role of land use planning. It is important that other relevant departments and agencies cooperate and undertake similar initiatives with respect to agriculture, rural development and countryside management.</p>	<p>No change</p>

Public Consultation Meeting in Gozo held on 20th August 2002

Item number	Summary of Comments	Directorate's Response	Amendment
8	<p>Mr. Victor Galea Pace, Member of Parliament</p> <p>Stressed the importance of the countryside with respect to tourism. Mentioned the problem connected with boreholes.</p>	<p>The issues connected with boreholes are acknowledged in the Topic Paper. The paper notes however, that the responsibility for issuing licences for the drilling of bore holes lies within the MRA and so does the issue connected with the maintenance of the quality of groundwater. The importance of the countryside for tourism has been tackled in the Topic Paper.</p>	<p>No change</p>
9	<p>Mr. Anthony Zammit, Ministry for Gozo</p> <p>Mentioned boreholes and their use for agricultural purposes.</p>		
10	<p>Mr. Anthony Zammit, Ministry for Gozo</p> <p><u>Question:</u> should the Structure Plan have a particular strategy for Gozo?</p> <p><u>Answer:</u> Gozo has a corrosion problem. Water catchment in Gozo is better than that in Malta. Furthermore, in Gozo, interventions were made to recover lost soil: a total of Lm170,000 were used to recover lost soil from the Marsalforn valley - this may have resulted in disturbance to the natural habitat. Measures connected with rehabilitation of rural areas require financial assistance. Therefore,</p>	<p>The current Structure Plan consists of strategic planning policies; however, in the absence of Local Plans, the Structure Plan has also included some local policies. At present, the Draft Gozo and Comino Local Plan has been published and the emerging Structure Plan may take a closer look at this strategy in the context of the national strategy of the Structure Plan.</p> <p>Although, the Topic Paper did refer specifically to Gozo and dealt with</p>	<p>No change</p>

	<p>Gozo may have different requirements than Malta.</p>	<p>relevant issues of the area, its main issues are tackled within the Gozo and Comino Local Plan.</p> <p>The Topic Paper suggests that problems connected with rural degradation should be tackled at source. For example, measures intended to prevent soil erosion are better than recovering lost soil and risk environmental damage.</p>	
11	<p>Mr. Victor Galea Pace, Member of Parliament</p> <p>Suggested the need to identify two valleys and initiate pilot projects to promote as tourist attractions. This way one can learn from mistakes.</p> <p>Farms close to residences in Gozo are mostly tolerated. However, farms in the vicinity of tourist attractions and/or popular areas are less tolerated.</p> <p>Farms should be close to industrial areas and quarries should be used for industrial purposes. Certain areas should be designated for farms and therefore, one will know the repercussions of buying property in these areas.</p> <p>Schemes of GCLP - Problems being encountered.</p>	<p>The Topic Paper acknowledges that valleys are important for their recreational, natural heritage value, geomorphology and hydrology. In this regard, the paper suggests that the emerging Structure Plan should focus upon the protection and management of the rural heritage, including management of visitors in heritage sites and areas. Therefore, pilot projects should be sensitive to the various values of valleys.</p> <p>People visit the countryside for its natural character and therefore, tourist interests should be focused upon countryside conservation, rural regeneration and environmental education. The paper suggests that through these measures, people's interests (including tourists) in rural areas are safeguarded.</p> <p>The paper identifies that lack of farm waste management, visual impact, proximity to particular land uses and</p>	No change

		<p>impact on ecology, are the key issues connected with farms. The paper suggests that the way forward may include measures for proper farm waste management, proper design that respects the rural character, screening of farms and suitable siting of farms.</p> <p>Issues connected with schemes and designation of areas for farms in Gozo are addressed in the Draft Gozo and Comino Local Plan.</p>	
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Presentation to Government Departments held on 07th August 2002

Item number	Summary of Comments	Directorate's Response	Amendment
12	Tony Meli, Department of Agriculture Agriculture faces a number of problems with respect to local climatic conditions: drought/wet season.	The problems that the agriculture industry is facing have been mentioned in the Topic Paper, although not all issues could be tackled through the planning system.	No change

<p>13</p>	<p>Tony Meli, Department of Agriculture</p> <p>There was lack of consultation with the Department of Agriculture on afforestation projects.</p> <p>MEPA's Landscaping Guidelines: the document does not take into account the change in climatic conditions. Climatic conditions are not the same as in the past – desertification and plants that resist today's climate should be introduced, preferably Mediterranean.</p> <p>The Landscaping Guidelines suggests trees that are not planted today or are not imported: need to be more practical.</p>	<p>The Department of Agriculture were involved in the preparation of the Planting and Landscaping Guidelines. Landscaping is used to screen development in the countryside and therefore is a suitable mechanism to minimise conflicts between landscape protection and needs for development.</p> <p>The Landscaping Guidelines provides a list of species that could be used in rural areas. In determining such list of species for rural areas, the Guidelines focused upon indigenous and archaeophytic species, which implies that due regard has been paid in the choice of species to the compatibility with local conditions. Other species compete with indigenous species for space, might be invasive species and do not form part of our rural environment.</p> <p>What is not imported and planted today can still be done in the future.</p>	<p>No change</p>
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14	<p>Tony Meli, Department of Agriculture</p> <p>Landscape management: its implementation is very difficult particularly due to issues connected with land ownership. Cladding of concrete/masonry boundary walls is not acceptable since this is incompatible with the character of the countryside.</p>	<p>Points noted. The Structure Plan and the Environment Protection Act of 2001 (LN 160 of 1997) protect rubble walls and the scenic value of rural areas by prohibiting materials that are inconsistent with the rural character.</p>	<p>The topic paper has expanded on issues connected with rubble walls</p>
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Interviews with NGOs and Agricultural Co-operatives after the issue of the draft Topic Paper

Item number	Summary of Comments	Directorate's Response	Amendment
15	<p>Rita Schembri, Farmer's Wine</p> <p>With respect to provisions for agricultural stores, there should be no difference between full-time and part-time farmers. Eligible farmers have to justify the need for a store, like the need to store equipment connected with drip irrigation.</p> <p>To develop a mechanism to assess justification for stores while removing those without permit.</p>	<p>The current Structure Plan limits agricultural stores to full time farmers. Issues connected with agricultural stores have been tackled in the Topic Paper. The paper suggests that instead of making provisions for full time farmers only, it is essential to make provisions for bona fide farmers whilst assessing the need for development.</p> <p>The Policy and Design Guidance on Farmhouses and Agricultural Buildings (currently being updated) reflects MEPA's current approach to their provision.</p>	No change

16	<p>Rita Schembri, Farmer's Wine Cooperative</p> <p>Rubble walls should not be constructed in masonry. Rubble walls should be maintained and constructed in traditional methods. High masonry walls obstruct visual access to the countryside. Non-traditional rubble walls increase risks of flooding in fields.</p> <p>Several rubble walls along roads are being replaced by franka walls.</p>	<p>With the creation of MEPA in 2002, the Authority is also responsible for affording protection to rubble walls under regulations for environment protection. Mechanisms affording this protection are spelled out in the current Structure Plan and LN 160 of 1997, which envisage that materials and textures that are not consistent with the conservation value of the countryside cannot be introduced.</p> <p>The Topic Paper also echoes the importance of rubble walls as these are part of our rural heritage, have an agricultural function and are important in terms of flora and fauna.</p>	<p>The topic paper has expanded on issues connected with rubble walls</p>
17	<p>Rita Schembri, Farmer's Wine Cooperative</p> <p>Viticulture should be promoted in the vicinity of roads as it helps its marketing.</p> <p>There are several abandoned fields in the countryside mainly due to lack of access. We need to consolidate our land holdings.</p>	<p>The Topic Paper does not indicate anything that can be construed to reflect discouragement to viticulture on existing agricultural land. Land consolidation is not a land use issue and therefore cannot be tackled through the planning system. Some measures towards land consolidation are being addressed within Government's emerging Rural Development Plan.</p>	<p>No change</p>

18	<p>Rita Schembri, Farmer's Wine Cooperative</p> <p>In water catchment areas, we need to maintain dams that are used for irrigation of agricultural land and help creation of natural habitats.</p>	<p>Dams cannot be constructed in all valleys, as valleys are also important from the social and environmental points of view. Existing dams need to be maintained regularly so as to remove silt. The types of acceptable techniques for the maintenance of dams depend upon the conditions and sensitivity of wildlife of affected valleys.</p>	<p>No change</p>
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<p>19</p>	<p>Rita Schembri, Farmer’s Wine Cooperative</p> <p>The visual impact of electricity poles and cables should be mitigated.</p> <p>Design of agricultural development should resemble traditional structures like the “sienja”.</p>	<p>The visual impact of electricity poles and cables is in fact significant in rural areas as these hinder the aesthetic value of the countryside. The current Structure Plan advises that permission for these services will only be given if the Authority is satisfied that all possible measures have been taken to mitigate the visual impact of the proposed development (RCO 5).</p> <p>The Topic Paper refers to the visual impact of agricultural development and farm buildings due to their cumulative impact, lack of landscaping, improper siting of development and bad design. Amongst other measures, the paper suggests that legitimate development in rural areas should have regard to the rural character.</p>	<p>No change</p>
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20	<p>Aldo Azzopardi, Kaccaturi San Ubertu</p> <p>Measures to remove intrusive objects (like drums in rubble walls) from the countryside should be introduced.</p> <p>Hunting hides should not be erected with scrap metal; these should be in rubble.</p> <p>Access: nature trails and heritage trails should be established. It is good to safeguard access but it should not restrict the firing range.</p> <p>Sometimes conflicts between hunters and visitors emerge due to arrogance of visitors.</p>	<p>The Structure Plan already makes provision for the removal of elements that are intrusive in the rural environment.</p> <p>The current Structure Plan designates various routes as Country Parkways, but during the past years there was no management of public access. The emerging Structure Plan will tackle the matter in greater detail.</p>	No change
21	<p>Aldo Azzopardi, Kaccaturi San Ubertu</p> <p>Some hunters and trappers place nets between trees.</p> <p>Hunters and trappers take government land for cultivation purposes; however, they do not cultivate such land. They use it for hunting, plant eucalyptus and acacia trees and develop tall structures (to use as hides) for hunting.</p> <p>Some occupy land, close it off and put up a sign "Reserved".</p> <p>Some farmers give their land (which is Government Land) for hunting purposes.</p> <p>In places (particularly Government land) where</p>	<p>Hunting and trapping are controlled through the Environment Protection Act of 2001, which makes provision for various social and environmental matters. Therefore it is an enforcement issue.</p> <p>Furthermore, the issue connected with the use of Government land cannot be tackled through the planning system.</p> <p>Conflicts between hunting/trapping and countryside recreation: enforcement of existing legislation should contribute to the minimisation of these conflicts. Furthermore, the paper suggests that provisions for countryside recreation</p>	No change

	<p>hunting is allowed, the words “to hunt” should be included in land contracts.</p> <p>Hunting is part of our tradition.</p> <p>Agro tourism: hunters should help in tourism and should be aware of cultural features, flora and fauna.</p>	<p>should include criteria to control visitors’ behaviour and activities. Therefore it is essential to establish what visitors can do and cannot do in the countryside.</p> <p>Other points concerning the issue of hunting are noted; these are general observations and suggestions. The Leisure and Recreation Topic Paper, the Coastal Strategy Topic Paper and the Tourism Topic Paper provide further information on the issue of hunting.</p>	
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22	<p>Charles Galea, Dilettanti tas-Senter u l-Gabbjun</p> <p>Various rubble walls are being dismantled and the rubble stone stolen. People go with trucks in the countryside early in the morning to steal rubble stone. Rubble stone is stolen for cladding purposes; authorities need to ask developers to state the source from where rubble stone was obtained.</p>	<p>Point noted. This is an enforcement issue. However, it is important to prohibit dismantling of rubble stone from the countryside to use for cladding purposes.</p>	<p>The topic paper has expanded on issues connected with rubble walls</p>
23	<p>Charles Galea, Dilettanti tas-Senter u l-Gabbjun</p> <p>Litter – broken glass – is also becoming dangerous in the countryside.</p> <p>Other issues consist of litter resulting from picnics, damage to rubble walls and loss of soil.</p> <p>Hunters take care of the rural environment; hunters maintain rubble walls and take care of trees.</p> <p>The use of scrap materials in the countryside, like drums etc. should be halted. Dumping of inert waste and other objects is an issue.</p> <p>Hunters and trappers should collect their own litter including used cartridges.</p>	<p>The Topic Paper identifies the need to manage rural areas and initiate schemes for landscape enhancement in the countryside on a large scale. Regulations aimed to improve the management of these areas include environmental protection as well as issues connected with dumping of inert waste and other litter, which however, needs to be enforced. Other issues are outside the responsibility of the planning system.</p>	<p>The topic paper has expanded on issues connected with rubble walls</p>
24	<p>Charles Galea, Dilettanti tas-Senter u l-Gabbjun</p> <p>There are two extremes with regards to hunting and trapping: we need cooperation between the two sides.</p> <p>We need to educate hunters and trappers to build</p>	<p>Points noted. Issues connected with ‘sporadic’ development in the countryside are addressed in the Topic Paper. Other issues are outside the responsibility of the planning system.</p>	<p>No change</p>

	<p>hides (“duri”) according to the character of rural areas so as to blend and be integrated with the surroundings.</p> <p>Development of land: more efficient use of land. Sporadic development and development in valley sides should be halted.</p> <p>Development of mills instead of rural rooms.</p> <p>Wardens are concerned with traffic only – they should be aware of environmental matters.</p>		
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25	<p>Joe Catania, Moviment Kaccaturi Nassaba Ambjentalisti</p> <p>Often visitors interfere with hunting activities, asking questions on birds, hunting etc... Picnicking during hunting seasons should be controlled. Collection of snails should also be controlled, as this results in damage to rubble walls. Often visitors leave litter in the countryside and take fruits from trees in private land. Use of the countryside: it is for the benefit of everyone. The public should be informed about current laws but some people go out early in the countryside to find the best places.</p>	Points noted. The Topic Paper suggests that designation and management of public access to the countryside and recreational sites should incorporate measures for visitor management, so as to minimise conflicts between recreation and other uses in the countryside. This includes measures that control visitor activities and behaviour. Furthermore, existing legislation needs to be enforced, so as to minimise potential conflicts.	No change
26	<p>Joe Catania, Moviment Kaccaturi Nassaba Ambjentalisti</p> <p>Trucks taking rubble from walls.</p>	Point already tackled above (refer to response no. 22).	No change
27	<p>Joe Catania, Moviment Kaccaturi Nassaba Ambjentalisti</p> <p>Segregation between hunting agencies: they take land and do not allow access to other hunters.</p> <p>No land for hunting designated.</p> <p>Planting of trees in rural areas should be encouraged.</p> <p>Barren/neglected land could be rehabilitated for hunting purposes.</p>	Points noted.	No change

	<p>Education of hunters on the environment by hunting agencies – they need help and resources. The taxes that are paid in connection with hunting and trapping should go into a fund to start various initiatives with respect to education. Hunting agencies encountered constraints when lobbied for the preparation of educational initiatives for hunters.</p>		
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28	<p>Tony Cassar, Marsovin</p> <p>Maghtab: its impacts on the countryside and heath. Flow of drainage into the sea is another problem.</p> <p>Most of the conflicts and impacts are connected with our high population density.</p> <p>We need to provide incentives to reduce use of cars.</p>	<p>Points noted. Most of these issues have been addressed in other Topic Papers, like the Coastal Strategy Topic Paper and Transport Topic. These Topic Papers could be accessed from www.mepa.org.mt.</p>	No change
29	<p>Tony Cassar, Marsovin</p> <p>We need to recycle waste: crushing of building material and compost for land reclamation on rocky areas, preferably near new RO plants.</p> <p>Lack of water resources for viticulture: we need to recycle water.</p> <p>Wine industry: for the future we need wine estates so as to link the commercial aspect of viticulture with tourism – we need policies.</p> <p>Wine estates could be developed on 50 tumoli of land and requires storage facilities, residence for owner and underground cellars.</p>	<p>The Waste Subject Plan explains the need to recycle waste. However, deposition of soil on rocky areas is deemed to be unacceptable, as such rocky areas form part of the natural heritage. Significant damage has already been caused by deposition of soil on rocky areas in the past. This matter has already been tackled in the Topic Paper.</p> <p>The Tourism Topic Paper and the Rural Strategy Topic Paper have addressed issues connected with rural tourism. Furthermore, the Policy and Design Guidance on Farmhouses and Agricultural Buildings is currently being updated.</p>	No change

Comments received by Snail Mail and Electronic Mail

Item number	Summary of Comments	Directorate's Response	Amendment
30	<p>Tommy Cauchi</p> <p>As amply explained in the report, Malta's rural areas are not only contracting every year but are far from well managed.</p> <p>Malta's policy for developing new building areas has been and is still that of limiting the height of the building. The natural side effect of that policy is expansion sideways through encroachment on rural areas. The official message is derived from this imposed policy. What is astonishing is that your Authority has approached a plan of development that still retains this archaic rule of limited height.</p> <p>The retention and preservation of old buildings and heritage areas especially in what is called in Italy "<i>il centro storico</i>" of every town and village has necessarily to be scrupulously safeguarded. But outside that imaginary boundary of every locality buildings should be free to rise to any height. Of course, this will only exclude <u>few</u> areas specifically earmarked for villas.</p> <p>It is not that the skyline is not important but in the circumstances, it is less so than the rural areas and the availability of space. Every policy has necessarily its strong points and its weakest ones. Every time a policy is decided upon, the points in its favour generally outweigh its weakest points. In our case, we either have a skyline similar to other cities in Europe or finish up as one built-</p>	<p>Malta's policy for developing new building areas is not restricted to limitations on height of buildings, but is stated in the Structure Plan for the Maltese Islands which takes into consideration the socio-economic and environmental fabric of the Maltese Islands. In fact, the Structure Plan channels urban development towards existing and committed built-up areas and therefore prohibits urban development outside these areas.</p> <p>Issues connected with efficient use of urban space, limitations on the height of buildings in urban areas and Urban Conservation Areas are addressed in the Urban Conservation and Built Environment Topic Paper.</p> <p>Issues connected with the coastal environment and dumping at sea are addressed within the Coastal Strategy Topic Paper, Waste Subject Plan and Position Paper on Dumping at Sea. All Structure Plan Topic Papers as well as other studies are accessible from www.mepa.org.mt.</p>	<p>No change</p>

	<p>up area with no countryside, no greenery, no rural heritage etc, etc.</p> <p>But the Maltese mentality is to live in a house with two floors, some may say. Yes but they have to pay for it. To stimulate such initiatives in the private sector and individuals, a policy of “the-higher-you-go-the-less-you-pay” (for the building permit) has to be implemented. I am sure the Maltese will certainly respond adequately.</p> <p>Another policy that has the same connotations is land reclaiming from the sea. It gives some more development space, such as yacht marinas etc. Ecological aspects are to be safeguarded, but again its importance has to be weighed against other specific aspects, besides the fact that in most cases, the ecological environment returns to normal after a certain number of years, an example is Mgarr Harbour in Gozo.</p> <p>The MEPA has to have a leading role in the changing of our traditional way of thinking and in doing so it may have to force its way through the thick crowd of pressure groups which notwithstanding their good intentions to protect what they believe should be protected, often see only their point of view and lose sight of what is the general good for Malta and Gozo and their populations.</p>		
31	<p>Tony Meli, Department of Agriculture</p> <p>There appears to be general agreement on most issues except for a few minor issues: issue of field stores. It will be essential that the same measures / procedures be adopted for all, throughout Malta & Gozo. This point is being made since it appears that a different approach has been referred to in the case of the Gozo paper. The</p>	<p>At present, the Policy Guidance Note on farmhouses and Agricultural Buildings (published in 1994) is being reviewed and will adopt a common position with respect to agricultural stores and therefore the same approach will be adopted throughout Malta and Gozo.</p>	<p>No change</p>

	<p>implied 25% reduction in reference size could see the number of stores doubling according to available statistics. Whatever the desired outcome, the same measures should be applied transparently throughout.</p>		
32	<p>A.N. Welsh, Malta Geographic Society</p> <p>Urban Sprawl. There should be no further development permitted in rural areas, however justified, e.g. schools, hospitals etc. Unless this is rigorously applied pressures will lead to the marginalisation of the countryside – there will be nothing left worth preserving.</p> <p>Rural settlements. The countryside takes its character from small farms, and we would do nothing that hinders the continuation of this type of activity, subject to comments made below. As in the UK and elsewhere the PA may consider rejecting applications for change of use.</p> <p>Countryside Recreation and Rural Tourism. There are recreational areas, sports grounds, leisure and theme parks all over the world, and while we understand the requirement for such facilities, the Islands are too small for a major extension of such places; more important to us is the unique and attractive nature of our countryside; this attracts repeat visitors and is something we surely want to preserve for future generations. This of course involves public access, and every time we go out we find old footpaths and bridleways barred, and marked Private or some such unfriendly message. Open areas are often sprinkled with hunters' hides, and walkers are warned</p>	<p>Points noted. These issues are addressed in the Topic Paper. Some of the issues are tackled within other Topic Papers such as the Coastal Strategy Topic Paper, Leisure and Recreation Topic Paper, Minerals Subject Plan and Tourism Topic Paper, accessible from www.mepa.org.mt.</p>	No change

away.

Rural Conservation. Fly tipping, four wheel drive and motorcycle activity, bulldozing of old sites and rubble walls, unauthorised constructions, the advance of new houses etc are turning the countryside into a sad spectacle. There is a limit to what the PA can do, but more vigorous enforcements, based on regular physical inspections would help. The PA is already working with organisations such as Din L’Art Helwa and Nature Trust regarding the cultural and natural heritage, and our Society would also be glad to help.

Agriculture. As stated above, it is farming that has created most of our landscape, and it should be encouraged for many reasons, warts and all. What we would object to is the enclosure of public land and footpaths, and a survey of land ownerships and footpaths is urgently required. Care should be exercised to see that potential archaeological sites are not brought quietly into cultivation and destroyed. The PA should take a more proactive role in looking after what little remains of “true” countryside.

Quarrying and the Minerals Subject Plan. As it has been reported that the majority of quarries are in breach of planning regulations or consents we can only hope that the PA can gain some sort of control of quarrying. Some quarries are becoming enormous scars on the countryside, with spill over into surrounding area. Painful and difficult though it may be, further extension of quarry areas has to be limited or stopped; most with modern technology can go deeper. The plans for infill of worked-out quarries should be given more teeth; clean stone waste or builders rubble should not be tipped at Maghtab

	etc, but put straight down these unsightly and dangerous holes.		
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