

LOCAL PLANS INTERPRETATION DOCUMENT

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PREAMBLE

This guidance is intended to achieve a number of objectives namely :

- a) To facilitate policy interpretation of Local Plan Policies
- b) To indicate the procedure when identified situations arise
- c) To guide interpretation when identified anomalies arise

It is a dynamic document in the sense that it is envisaged to be continually updated to serve as a reference point when issues of policy interpretation arise. The document is also formatted in terms of these objectives. This implies that Section A of the document is devoted to policy interpretation, under the headings – General Considerations, Building Heights, Tall Buildings and FAR, Urban Conservation Areas, policies relating to 120 sq. m. limitation in net floor space, Town Centres and Commercial Areas and ODZ related policies. Refence 8 relates to area specific policies and is subdivided according to the 5 recently approved Local Plans. Section B on the other hand is procedural and directs how certain difficulties should be addressed from a procedural point of view. Section C is the Errata Corrige section and is divided into general considerations and a section for each of the 5 recently approved Local Plans. This section highlights a number of errors that were reported subsequent to the approval of the Local Plan. There is a clear justification as to why the indicated issues are errors and in no way do they constitute modification to an approved plan.

The following acronyms are used throughout the text -: North Harbours Local Plan (NHLP), Northwest Local Plan (NWLP), Grand Harbour Local Plan (GHLP), Central Malta Local Plan (CMLP), Gozo and Comino Local Plan (CMLP)

It is intended to place the Local Plans interpretation document in MEPA internal and external shared folders where it will be electronically accessible. Obviously the success of this tool would depend on the participation of internal and external users communicating their interpretation concerns so that these are eventually addressed.

An e-mail address has been created to serve as a focal point through which interpretation or ancillary concerns are channelled. This is **planning queries** for internal users and **planning.queries @ mepa.org.mt** for external users. It is important that if a user spots an error in a Local Plan, checking should first be undertaken with the Local Plans interpretation document to find out if this error has already been reported and addressed. Should this not be the case, then the error should be communicated through the e-mail address indicated above.

It is important to note that there are some headings which are indicated but as yet have no content for interpretation. This is not an error but is intended for updating purposes in the future.

It is hoped that this guidance will also serve to reduce inconsistencies in recommendations and decisions so that the planning process is rendered more equitable and disagreements arising from different interpretations on broadly similar cases are as much as possible avoided.

FREQUENTLY ASKED QUESTIONS IN RELATION TO THE APPLICATION AND INTERPRETATION OF LOCAL PLANS:

i. WHAT IS THE STATUS OF THE LOCAL PLAN IN RELATION TO PREVIOUSLY APPROVED POLICIES, PLANS AND OTHER INSTRUMENTS?:

As a general rule, the Local Plan automatically supersedes all previously approved policies, plans and other planning instruments which are in conflict with the Local Plan. Nonetheless, MEPA is in the process of identifying these policies, plans and other instruments with a view of publicizing their repeal, in full or in part.

Furthermore, as a result of the Local Plan, all development applications must be assessed in the light of the respective policy applicable to the site in question, and not in relation to other commitments (use or height) in the vicinity, unless this is allowed in the specific policy in the Local Plan itself or in another policy document in force.

As such the discretion of the decision making bodies is to be applied in relation to application and interpretation of the policies contained in the Local Plans and in other plans in relation to the application in question.

ii. WHAT IS THE STATUS OF PENDING AND PRE-DECISION DEVELOPMENT APPLICATIONS?:

All planning applications which were still pending as on Thursday 3rd August 2006, the date of formal approval by the Hon. Minister of the Local Plan, or which having been referred to the relative decision making body (MEPA, DCC or Appeals' Board) prior to such date, but no decision (minuted) has been taken prior to such a date, are to be assessed and determined with the current policies, i.e. including the Local Plan.

All planning applications which have been decided prior to such a date, or where the decision making body (DCC, MEPA or PAB), has taken a decision in principle in favour of the application or a particular aspect of the application (minuted) shall be considered as prevailing over the provisions of the Local Plan.

These cases would normally refer to those cases where the formal permit would not have been issued since it is either awaiting typing, or alternatively if the file is still pending since after the decision has been taken, it has been referred to the Directorate for amended conditions, or to the applicant for the payment of a fine or of a planning gain or for the submission of a bank guarantee or other information.

Those applications where no formal decision has been taken but a decision in principle in favour of the application has been taken or a strong commitment has been given and minuted, are to be referred to the MEPA Board.

iii. WHAT IS THE STATUS OF OUTLINE PERMITS AND FULL DEVELOPMENT PERMITS IN RELATION TO CHANGES IN THE LOCAL PLAN?:

In accordance with the provisions of S.33 of the DPA no change in a Local Plan may adversely affect the vested right arising from a valid development permit. The DPA does not distinguish

between an outline and a full development permit and as such the assumption is that this provision applies to both.

Therefore, the principle approved in an outline development permit, as determined and approved in the decision in accordance with the description, shall prevail over the provisions of the Local Plan, provided that the said outline permit is still valid. This means that a full development application submitted within the validity of the outline development permit, must be assessed in the light of the principle/s approved by the outline permit.

Likewise, an approved full development permit, if still valid, prevails over the Local Plan provisions. As such, if the applicant requests an amendment to the full development permit, it is only this amendment that must be assessed in the light of the Local Plan and not the whole permit afresh.

The same applies if the applicant requests a reconsideration or an appeal from a condition/s of an approved permit. Only the respective condition/s must be assessed in the light of the Local Plan.

Where the applicant requests a renewal of the development permit within the validity period in accordance with the provisions 33(3) of the DPA and there is a firm commitment on site in that part of the development which may give rise to a conflict between the existing policies and the previous policies governing the original development permit the principle of the previous permit shall prevail. On the other, if the development has not reached this stage, the provisions of the Local Plan shall prevail.

This obviously applies if the applicant requests MEPA to assess his pending application in the light of the vested rights acquired by him through the previous permit.

iv. WHAT IS THE STATUS OF SETTLEMENTS (CATEGORY 1,2 & 3) AND AREAS OF CONTAINMENT?:

These settlements and areas of containment are in force in accordance with the policies applicable to the respective settlement and area of containment as listed in the Local Plan.

v. WHAT IS THE LEGAL STATUS OF SCHEME EXTENSIONS APPROVED BY VIRTUE OF THE PARLIAMENTARY RESOLUTION?:

In those areas, apart from established areas of Hal Farrug and Mtarfa, where the zoning, road alignment and other material planning issues have not been determined, an application may be validated but not determined in favour of the applicant.

vi. WHAT IS THE LEGAL STATUS OF CONSTRAINTS?:

Those constraints that have been adopted in the Local Plan, together with constraints made by MEPA or any entity within MEPA or the Planning Appeals' Board, are to be applied and interpreted as policies of the said Local Plan.

All other constraints made at the request of third parties, including government entities, are to be interpreted as a requirement for consultation, the outcome of which must be applied in accordance with usual procedure.

vii. Procedure:

All queries shall be channelled to a team. This team shall be composed of Local Plan Unit, DCU, Legal Office and Management.

A link on the Web Site shall be created for all queries and clarifications.

A. POLICY INTERPRETATION

REFERENCE	ISSUE	INTERPRETATION
1.	GENERAL CONSIDERATIONS	
1.1 Constraints	How are constraints arising from constraints Maps to be interpreted?	<p>Those constraints which originate either from the Local Plan or are based on MEPA decisions shall be the basis of determination of a development planning application. In cases where there is conflict between a previous MEPA decision (including PA and PAPB decisions) and the current Local Plan, the provisions of the current Local Plan should prevail.</p> <p>Third party constraints (including those originating from government, utilities providers and the private sector) are only intended to raise the case officer's awareness on the need to consult with the said third party before concluding the DPAR.</p> <p>(also refer to Section (vi) in the Frequently Asked Questions Section)</p>
1.2 Development Planning Act article 28 (4)	<p>The Dev. Planning Act at article 28 (4) indicates what constitutes minor modifications.</p> <p>Since article 4(a) specifies that changes to the alignment of the roads and buildings can be done in a TPS (now superseded) or in a Local Plan, can such changes be made outside the development boundaries as the Local Plan contemplates certain forms of development which occur beyond the Development Zones (e.g. Areas of Containment , Rural Settlements, etc.)</p>	<p>Reference to the DZ rationalization exercise still indicates Areas of Containment and Rural Settlements as lying ODZ and therefore these should be treated as such. It is understood that the main complications would arise in parcels of land within Areas of Containment which are still undeveloped. In such cases, the direction for comprehensive planning in the respective Local Plans is envisaged to address the issue.</p> <p>It is also important to note that Article 28(3) and 28(4) do not distinguish between areas outside the Development Zones and other development boundaries as both are indicated with a Local Plan. Therefore, changes to alignment of roads and buildings can still take place in areas which occur within some form or another of a development boundary. However this can only be done after the provisions of the relevant Local Plan policies (e.g. requirements for comprehensive planning) are satisfied.</p>
1.3 Reasons for refusal – SET 8 and BEN 4	Is the reference to policies SET 8 and BEN 4 as reasons for refusal still applicable after the approval of the Local Plans?	No. If a refusal is based on a specific condition (e.g. alignment) the condition for refusal should be based on the nature of the specific condition.
1.4 Depth of Plots in Gozo	<p>Since PAPB time, it has been the practice to limit building depths on the edge-of-development boundaries up to a maximum of 25 metres.</p> <p>The approved Local Plan refers to this in Policy GZ-EDGE-3. However, since the building depth is not specified, what is the interpretation?</p>	<p>The building depth is still 25m. In the case of Gozo, the plot depth is however taken to be 30 m. This factors in the traditional small backroom which is so prevalent in Gozo. The total plot depth has also been adopted in the DZ rationalisation where the 30 m depth is specified.</p> <p>The 30 m is taken to include the 25m building depth, the 3m back garden and the 2m room at the back.</p>
1.5 Clusters of Shops in Residential Areas	Are clusters of shops in Residential Areas - which individually are less than 75 sq.m. each but together add up to more than 75 sq.m. acceptable?	When applications, as submitted individually, do not exceed the policy parameters, these shall be regarded as compatible with the LP policy. If however, they are submitted as separate non-connected units exceeding 50 or 75 sq. m. in a single application or there is a request to connect a number of small shops together in a non-commercial area, these shall not be construed to be generally compatible with the policy and should normally be refused.

REFERENCE	ISSUE	INTERPRETATION
2.	BUILDING HEIGHTS	
2.1 Building Heights in Industrial Areas	Is there a difference in interpretation of building heights between industrial areas and other urban areas ?	For three floors (Industrial Areas only), 14m height is allowed even where there is no semi-basement, whereas in other areas this is not permissible.
2.2 Interpretation of Building Height	If there is a proposal for a three floor building which can be fitted within the height of an existing building or a building with two or less floors and the design is highly commendable but the number of floors is higher than that indicated in a Local Plan, would such a proposal be acceptable?	<p>Aesthetic considerations or the height of the building are not the only considerations which needs to be taken into account when assessing a development planning application. Floors are also centres of activity generation. This is a very important concept and not giving it the due consideration will result in increasing the development intensity in an area over and above that which is statutorily indicated in a local plan.</p> <p>Therefore, unless the local plan's policy or its interpretation indicate otherwise, development proposals should strictly adhere to the number of floors stipulated in an approved local plan.</p>
3.	TALL BUILDINGS & FAR	
4.	URBAN CONSERVATION AREAS	
4.1 UCA Heights	Does the issue of predominant height still apply?	In general, the former interpretation of predominant heights has become obsolete. With the approval of Local Plans, the Height Limitation Maps, coupled with the relevant policies, prevail. There are however instances (e.g. In the NWLP - refer to section 8.2c.) where other directions are given. There are also instances where specific policies guide towards departure from the indicated height limitation. However, in such cases the indicated height limitation is still the benchmark upon which the departure is based. Specific guidance on policy interpretation relating to assessing proposals situated between permitted buildings higher than the indicated height limitation found in "Policy and Design Guidance 2007".
4.2 UCA boundaries	Are the provisions of the fact book relating to UCAs still valid?	As a result of the approval of the Local Plans, some of the provisions within the fact book would be superseded unless the contrary is specifically indicated in a particular Local Plan (e.g. In NWLP policy NWUS 5). There is also the intention to revise the policy on Development Control in UCAs (1995) to better reflect the situation arising from the approval of the Local Plans.
4.3 Scheduling shown on Local Plan Maps	What takes precedence in case of discrepancy between the scheduled buildings identified on Local Plan Maps and the data on the Map Server?	Local Plans indicate that there should be reference to the MEPA webserver. The Local Plans only indicate a snapshot in time and the scheduling process is a dynamic one.

REFERENCE	ISSUE	INTERPRETATION
5.	POLICIES RELATING TO 120 SQ. M LIMITATION IN NET FLOORSPACE	
<p>5.1 Applicability to the Penthouses in Policies relating to 120 sq. m. net floor-space in Iklin, Swieqi and other indicated areas.</p> <p>Policies NHSW 05 (NHLP) , SMHO 02 (SMLP), NWUS 3 (NWLP) , NWUS 4 (NWLP)</p>	<p>Is this policy also applicable to the penthouses ?</p>	<p>Refer to "Policy and Design Guidance 2007" Part 17 on pp. 116 and 117</p>
<p>5.2 Interpretation of net floor-space in Policies relating to 120 sq. m. net floor-space in Iklin, Swieqi and other indicated areas.</p> <p>Policies NHSW 05 (NHLP) , SMHO 02 (SMLP), NWUS 3 (NWLP) , NWUS 4 (NWLP)</p>	<p>How is the extent of the 120 sq. m. net floor-space to be interpreted?</p>	<p>Refer to "Policy and Design Guidance 2007" Part 17 on pp. 116 and 117</p>
<p>5.3 Applications for additional units in areas where policies relating to 120 sq. m. net floor-space apply.</p> <p>Policies NHSW 05 (NHLP) , SMHO 02 (SMLP), NWUS 3 (NWLP) , NWUS 4 (NWLP)</p>	<p>In terms of policy NHSW 05 (and similar policies in other Local Plans) for 120sq.m, can new additional units (such as additional floors and/or penthouses) be allowed when the existing units are less than 120sq.m.?</p>	<p>Refer to "Policy and Design Guidance 2007" Part 17 on pp. 116 and 117</p>

REFERENCE	ISSUE	INTERPRETATION	
6.	TOWN CENTRES AND COMMERCIAL AREAS		
6.1	All Local Plans – Reference to Primary, Secondary and Tertiary Town Centres and Neighbourhood Centres	In the policy context, reference to Primary, Secondary and Tertiary Town Centres as well as Neighbourhood Centres is found.	Reference to Primary and Secondary Town Centres is taken to refer Town Centres. Tertiary Town Centres and Neighbourhood Centres are taken to refer to Local Centres.
6.2	Policies 15.7 and 15.9 in DC 2005	Policies 15.7 and 15.9 in DC 2005 refer to commercial and town centres defined in Local Plans. Can these apply in tourism zones as well?	Entertainment Priority Areas and Tourism areas have a strong commercial element and therefore the term commercial is deemed to apply to these areas as well. This clarification has been indicated in Policy and Design Guidance 2007 policies 15.7 and 15.9.
6.3	Offices at Penthouse level – Policy 10.6 in DC 2005	Are offices at penthouse level acceptable within Secondary Town Centres, in view of policy 10.6 of the DC2005 that limits the use at penthouse level to residential purposes?	Request is based on Policy and Design Guidance 2005. Refer to "Policy and Design Guidance 2007" in revised section 10.6.
6.4	Residential Development at Ground Floor Level in Town Centres - Town Centre Policies in relevant Local Plans	Do Town Centre policies in Local Plans prohibit residential development at ground floor but allow residential development at semi-basement level? Is residential use at ground prohibited even if the semi-basement is commercial?	These policies ALLOW residential development at ground floor provided there is only one unit. If dwellings are allowed at ground floor then there is no reason to contemplate excluding the semi-basement. This statement becomes even more relevant in situations where differences in level between the Town Centre frontage and the back elevation permit residential development to have access from the back. The second part of the question is interpreted on the same lines to the above.
6.5	Class 4 shops in Commercial Areas	Are Class 4 shops between 75 sq.m. and 500 sq.m. allowable in commercial areas (e.g. of reference CG14)?	Given that 500 sq. m. are acceptable in commercial areas and that shops of 75 sq. m. are also acceptable, it is reasonable to presume that the direction will also apply to anything in between.

REFERENCE	ISSUE	INTERPRETATION
7.	ODZ RELATED POLICIES	
7.1 Policy CG04 – C (Also relevant to other Local Plans)	In the emergent guidance "Policy and Design Guidance – Agriculture, Farm Diversification and Stables", there is reference to a specific distance of 200 m from an inhabited area (and a specific qualification that Rural Settlements are inhabited areas) but in some rural settlements there is no settlement boundary from where to measure the distance. Moreover, some of the designated settlements include a mixture of farms, construction plants and sparse residential units. This can create problems with the upgrading of existing farms (e.g. to comply with EU standards)	Discussions with the Environment Protection Directorate indicate that the reference to inhabited areas will only be applicable to areas within the Development Boundaries (and therefore will not apply to ODZ Settlements, Areas of Containment, small clusters of dwellings or single dwellings which lie ODZ)
7.2 Rural settlements and farm dwellings (e.g. CG04 –B) (Also relevant to other Local Plans)	In some cases, animal husbandry units qualify to have an ancillary dwelling unit. What happens when the farm happens to lie within a rural settlement? Would the policies of the rural settlement or those relating to farm buildings/dwellings prevail? Is Section B in policy GC04 – B an enabling policy for arable farmers and other growers or disabling for livestock farmers?	Given that farm buildings would qualify to have farm dwellings (provided all qualification parameters are satisfied) in the open countryside, they should qualify more when they lie in the vicinity of a rural settlement. A rural settlement has built elements and although still ODZ, can accept higher levels of built intervention than the rest of the countryside. Moreover, a farm near or within a rural settlement can utilise any existing buildings or gaps within the settlement to locate the residential component, thus further consolidating the settlement. It is not reasonable to expect more onerous conditions on the farm dwelling when this happens to lie within an ODZ settlement. Also note that a policy on "Agriculture, Farm Diversification and Stables" has been approved by MEPA Board . It may be helpful to consult on this through MEPA's internal forum - DC-EPD.
7.3 Permitted Development in Category 1 ODZ settlements	Policies governing settlements ODZ, e.g. Category 1 settlements, etc., often impose a height limitation. Considering that these settlements have not been included within the Development Zone, but have been retained ODZ, should roof structures, washrooms, penthouses, etc., as allowed by DC2005 Part 10, be also conceded, or should the capping of the height be taken to be comprehensive and disallowing these structures. (In the latter scenario, should stairwells be allowed?) Which of the following can be considered applicable: Policy 10.1 (washrooms), 10.4 (residential rooms on roof, but with a specified area), 10.6 (penthouses with only front and rear setbacks imposed), 10.8 (duplex units, with only front and rear set-backs imposed but no max. area)? It is not clear how to interpret Policies 10.6 and 10.8 for ODZ settlements and in any case these only apply to buildings with 3 floors so these would be allowable in three floor settlements allowable in the NWLP. Which of Policies 10.9, 10.11, and 10.12 (referring to what is permissible over the roof of the washrooms/penthouses, etc.) can be taken to apply to such Category 1 residences? Would residential basements be acceptable given that these are uncharacteristic of a rural context, and that sub-basement parking is also unacceptable due to the ensuing intensification of traffic in a rural settlement?	The main planning rationale in ODZ settlements is one of consolidation, coalescence and containment. Penthouses constitute separate dwelling units. So would other extensions at the rooftop which include the whole or parts of a residential unit (e.g. Duplex units) The thrust should therefore be to limit roof structures to service ones (e.g. washrooms). An element of discretion is advocated in the case of stairwells especially in the more traditional settlements in view of implications on the character of the area. As a rule of thumb, refer to policy for roof top structures allowable in Category 2 ODZ settlements. Given that Category 1 settlements lie either at the edge of a Development Zone or lie some distance away from it, it is not advisable to allow additional residential roof-top structures. Policies 10.1 and 10.4 are relatively straightforward since a maximum area is specified in both policies. 10.6 would be only applicable to NWLP where policy is explicit in this respect. If 10.6 applies, then 10.8 would apply as the conditions are similar. There should be a presumption against 10.9 and 10.11 (as this follows from 10.4) 10.12 should be used with discretion. As a general principle, residential basements are not acceptable in ODZ settlements.

REFERENCE	ISSUE	INTERPRETATION
7.	ODZ RELATED POLICIES	
7.4 Semi-basements in Category 2 ODZ settlements	There are applications in ODZ settlements where an application for one floor and an underlying basement are requested. This is below the height limitation of two floors.	Basements (and especially semi-basements) are not seen as positive contributors to the frontages of these areas, especially where the ODZ settlement has traditional characteristics). Basements and semi basements should therefore be avoided, even if the proposal in terms of height still lies below the indicated two floors. It is important to note that a basement which is accessed internally and does not result in raising of the elevation by a number of courses may be favourably considered in Category 2 settlements.
7.5 DZ edge applications	What happens if there is an application for an end of Development Zone plot which is not shown in DZ rationalisation Maps?	DZ rationalization Maps have an Explanatory Note at the beginning. Point d) of the Explanatory Note makes it clear that not all end plots are indicated. This extract is being reproduced for ease of reference. <i>Not all end plots and proposed minor amendments to the Temporary Provisions Schemes indicated in the draft public consultation Local Plan documents are shown. Unless otherwise specifically indicated, scheme boundaries ending in blank party walls are considered to generally qualify for an additional edge plot with a lateral side garden but these would need to be determined on a case-by-case basis.</i> End of Development Zone applications on sites which previously lay in ODZ areas – whether shown on the DZ Maps or otherwise, need to be processed through the same procedure adopted for areas which have been added to the previous Temporary Provisions Schemes boundaries through the DZ rationalisation process.
7.6 Depth of Development in Category 2 ODZ settlements	Shall the boundary indicated around a Category 2 settlement be strictly followed or shall there be an element of interpretation?	Reference is made to the depth of permitted Development in Category 1 ODZ settlements as well as to the depth of permitted Development within Development Zones. In both cases a depth of 25 m is adopted. The maximum built footprint of 150 sq. m is permissible for a qualifying plot within a Category 2 ODZ settlement. This would normally have a standard frontage of around 6.3 m. which translates to a depth of around 25m. Therefore it is reasonable to assume the same depth of development for a Category 2 settlement. In cases where the boundary of a Category 2 ODZ settlement is closer to a frontage than 25m, then the 25m depth of the building should be assumed unless there are overriding planning , environmental or safety considerations.
7.7 Agricultural Development and Subdivision of Agricultural Land	Would Local Plan policies related to agricultural development preclude the development of agriculture-related buildings/structures in Areas of Agricultural Value (AAVs)? – (e.g. agricultural stores, reservoirs, greenhouses, etc.) The fact that the AAVs cover most of the countryside and as long as these structures are supporting agricultural interests, the directorate does not see conflict to having them in Areas of Agricultural Value. Is this interpretation correct	It is agreed that structures legitimate to agricultural activities should not be considered as constituting subdivision of agricultural land.

REFERENCE	ISSUE	INTERPRETATION
8.	AREA SPECIFIC POLICIES	
8.1 NHLP		
8.1a NHLP – NHSJ 15 - Policy Interpretation on the Union Club Site as a candidate site for tall buildings.	Would the Union Club site in Sliema qualify as a candidate site for tall buildings given that it lies in a residential area and that there seems to be a constraint on height limitation?	Reference is made to policy NHSJ 15 and Map 1. The issue of inconsistencies with policy NHHO01 is easily addressed because policy NHSJ 15 specifically refers to the development of new hotels and this suggests tourism use. In this sense the area clearly qualifies as a tourism hub and hence for tall buildings. In relation to the issue of height limitation, there is no policy that restricts the use of FAR in the area, either on the Union Club Site or on the surrounding areas. Therefore, the statement " <i>The scale of the proposed development is consistent with the building height limitation and the character of the area</i> " is interpreted to apply principally to the design of the massing of proposals on this site in relation to the surrounding areas as opposed to a strict capping on development not to exceed height limitation.
8.1b NHHO 01 - Msida Student accommodation	Does the 'student housing priority area' zoning at Msida (Map MP1) and relative policy NHMP 10 exclude the commercial uses which would otherwise be considered acceptable in residential areas as per policy NHHO 01 (ex: small offices) ? Do normal Class 4 shops such as grocer, butcher, etc qualify as 'student related' in terms of policy NHMP 10? Are Class 6 uses (bar, take-away, <i>pastizzeria</i> , etc) considered to be student-related, even though they are not considered acceptable in residential areas in terms of NH HO 01?	In addition to the uses allowed in Policy NHHO01, student housing, stationeries of any size and bookshops of any size may be allowed in such areas. These areas are not considered to accommodate exclusively student housing areas. The policy is promoting student accommodation due to the proximity of the area to university. Policies related to Residential Areas are therefore also relevant.
8.1c NHLP Maps GT2, SJ4 and MP2 – basements and semi-basements	Is basement level (0.9m) allowed in areas where a semi-basement is prohibited by the Local Plan (NHLP Maps GT2, SJ4 and MP2)?	In accordance with Policy NHSE02, consideration needs to be given to the existing building typologies on site and other self-imposed building characteristics. In the light of this Policy, whether a 0.9m basement is allowed or not would depend on its acceptability within the context of the site; i.e. whether adjacent building have the 0.9m basement or not and whether the 0.9m basement would disrupt the streetscape. It must be pointed out that the rationale of the policy is to safeguard existing streetscape characteristics.
8.1d NHGT07 and NHSJ06 – redevelopment of sites with less than 25m. frontage.	Do policies NHGT07 and NHSJ06 for redevelopment of sites with less than 25m frontage apply even if the adjoining buildings are of a mediocre quality and/or lower than the height limitation?	There are two main interpretation scenarios namely: a) Where the development site has a low building to one side and a high building at the other side, in which case the proposed development is to be of high quality but there should be a constraint so that when an application is submitted on the adjacent lower quality building, this latter intervention should mimic the design of the higher quality building, or b) Where the development site is bound on both sides by low buildings, then redevelopment should be allowed anyway since there is no "existing facade design" that the proposed development has to follow. Any following development would then have to follow the design of the first approved building.
8.1e NHSE 04 and interpretation of recessed heights	For sites located within designated UCAs, where recessed floors are permitted in accordance with the relevant building heights and urban design Maps, each recessed floor is to be setback by 2m from the building alignment of the underlying floor notwithstanding that this may not be in accordance with the provisions of DC2007. Penthouses above the recessed floors will not be allowed. In addition, and except for townhouses on 2 floors located within the Sliema UCA, a setback floor on residential buildings of not more than 2 floors that are located within UCAs may be permitted provided the setback floor is recessed by at least 2 metres from the front facade, notwithstanding that this would not comply with criterion 3 of para 10.5 of the DC2005. However all the other criteria of para 10.5 of the DC2005 are to be adhered to. Can a building in Triq Sant'Elija, in the part zoned for 3 floors plus 1 recessed (within UCA), have its recessed floor as a separate dwelling unit and not be internally linked with the floor below . Might not this be considered as a penthouse in its own right? Normally a penthouse in UCA's is only given on 4 floors, whereas the height limitation here is 3. So far a recessed floor within UCA's has always been considered as additional accommodation for the floor below and never a separate dwelling unit, which would be called a penthouse.	Policy NHSE 04 refers. The main difference in terms of setback between NHSE 04 and DC 2007 lies with the setback distance from the building alignment. In DC2007 it is indicated as 4.25m whilst in the Local Plan it is indicated as 2m. The distance indicated in the Local Plan prevails. Otherwise, the provisions of Para 10.5 of DC 2007 would remain applicable as stipulated in the policy.

REFERENCE	ISSUE	INTERPRETATION
8.2 NWLP		
8.2a NWLP - High Ridge Mellieha – villa area conditions	<p>Table 3.2 of the DC2005 Policy 3.2 does not include High Ridge Villas and shows two "types" of High Ridge Bungalows: one with 30% coverage and one with 40% coverage.</p> <p>Clarification is required with respect to the type of development that can be permitted within the area identified in the Local Plan as High Ridge Villas (Map 25) particularly the site coverage, and location of garage (BL/SC).</p>	<p>Original policy reference in draft NWLP was to DC 2000 and in which there was reference to High Ridge Villas. These conditions were however omitted in Table 3.2 of the DC 2005 Policy 3.2.</p> <p>In Table 3.2 in the DC2000, High Ridge Villas are listed with a 30% site coverage. This should be assumed to be the coverage for High Ridge Villas. This revision has been incorporated in Policy and Design Guidance 2007, Table 3.2.</p>
8.2b NWLP – Policy NWSP 11	How does this policy get implemented?	<p>The zoning for this and similar areas has been changed through the Local Plan. However three main conditions would need to be satisfied before the provisions of the policy can take effect.</p> <ol style="list-style-type: none"> The zoning conditions would need to be changed through an application covering the relevant land parcel in question. Applications on parts of the land parcels specifically indicated through the NWLP would not be deemed sufficient to qualify to trigger the contemplated change in zoning The consent of the owners of 75% of the resulting developable floor area. For interpretation purposes, a sub-parcel which is co-owned is considered as one owner. The consent of owners on the indicated parcels of land, who are already enjoying zoning conditions similar or better than those contemplated by the change of zoning, would not be required. Moreover, the area on which these latter owners occupy property shall not be deemed to count towards the "75%" calculation. <p>Once the change in zoning is effected through the PC application guided by LN 71/07, applications for a full development permit can be processed through the normal channels.</p>
8.2c NWLP – NWUS 5 Building Heights in UCAs	Policy NWUS 5 indicates that Guidelines regarding additional floors and building heights contained in "Development Control within Urban Conservation Areas 1995" should take precedence over building heights in certain localities within the NWLP. How should this be interpreted?	<p>This policy makes reference to Development Control within Urban Conservation Areas 1995 and that this should predominate over the indicated building heights. Reference to the section relating to additional storeys in the Guidance relates to guidance on Grades 1, 2 and 3 buildings. For level 1 buildings, no additional storeys are allowable. For Grade 2 buildings, the direction is to consider the possibility to achieve the designated height limitation through recessing. For Grade 3 buildings the direction is to normally respect the adjoining streetscape. As far as correlation with the surrounding streetscape is concerned, Grade 3 is more onerous than Grade 2 and this is a contradiction. Therefore the policy should be interpreted that for scheduled buildings (including all non-scheduled buildings within UCA), provisions less onerous than those applicable to Grade 2 buildings should be applied. There is also the intention to revise the policy on Development Control in UCAs (1995) to better reflect the situation arising from the approval of the Local Plans.</p>
8.2d NWT05 – Guest Houses and Holiday Flats	Does policy NWT05 allow holiday flats?	<p>Holiday flats do not constitute a defined use class and are therefore interpreted to fall under Use Class 1- residential development</p>
8.2e Policy NWRB2 – Excavations in Rabat	Policy NWRB2 is contradictory in that it adopts a presumption against excavations in Rabat but then requires evidence that such space is not detrimental to archaeology	<p>There is no contradiction in NWRB 2. It establishes a "general presumption" against excavations which means that such works would be allowed if there are no reasons to the contrary, such as archaeological finds and water sources.</p>

REFERENCE	ISSUE	INTERPRETATION
8.3 CMLP		
8.3a Para 12.1.17	Para 12.1.17 leads one to assume that the existing caravan site at Bahar ic-Caghaq will be upgraded but not relocated.	Map NAM3 indicates that a caravan site will be established next to I-Ghadira s-Safra. Furthermore, Map NAM 4 totally disregards the existing caravan site. Therefore the relocation aspect is indicated in other areas of the plan.
8.3b Map BKM4 Building Heights for Commercial Uses	Map BKM4; No building height limitations have been indicated for the Mriehel Industrial area, the assumption being that building heights for this industrial area can be regulated by Policy 14.3 of the DC 2005. However there are areas within the Mriehel Industrial Estate that have been rezoned to commercial uses and therefore strictly speaking are not regulated by Policy 14.3 of the DC02005. These commercial areas do not have their height limitation regulated in any way.	Given that height limitations are being indicated for the Mosta, Qormi and Santa Venera Industrial Areas, the height for other structures at Mriehel should be similar. In cases where height limitation is not indicated, the building height comparison should be made with areas in the vicinity with similar zoning conditions.
8.3c HA05 – Hamrun Design Priority Areas	How is the term “floor heights” interpreted in this policy?	“floor heights” means “floor to floor heights” and does not mean building heights. The same applies to other Design Priority Areas.
8.3d MO04 – Height Limitation	Is height limitation indicated for this industrial area applicable to Areas of Containment?	MO04 - This Policy refers to the industrial areas within scheme as indicated in the Area Policy Map and not to the Area of Containment. This is clear from the wording of the Policy.
8.3e MOM6- Height Limitation Eucharistic Congress Road, Mosta	Guidance is needed on the depth between the UCA and the three floor + penthouse in Eucharistic Congress Street - Mosta	The UCA should extend to a locus 10 m away from the UCA facades along Eucharistic Congress Road. This is based on the visibility of a 3m overlying structure, the topmost part of which is just visible to a person 2 m tall standing against the opposite frontages

REFERENCE	ISSUE	INTERPRETATION
8.4 SMLP		

REFERENCE	ISSUE	INTERPRETATION
8.5 GCLP		
8.5a Interpretation of actual extent of GZ-EDGE 1 policies	There are cases where a number of plots are lying roughly parallel to the Development Boundary and these are all included in the GCLP to qualify in terms of DZ-EDGE 1 policy.	The aim behind DZ-EDGE policies was to achieve a smooth transition between the Development Zone and the picturesque countryside in Gozo. Unless the public consultation exercise or other evidence indicated otherwise, a depth of around 1 plot lying perpendicular to the Development Zone was assumed. However, there are cases where plots lie parallel to the development zone. In such cases, only the plot immediately adjacent to the Development Zone should qualify in terms of DZ-EDGE policies. It is important to note the proviso on the Maps which allows for a degree of qualified interpretation. However, in all cases, the case officer should consult with Forward Planning to obtain an opinion on interpretation.
8.5b GZ-RLST-1 – interpretation of basement	GZ-RLST-1 states that the height limitation in Category 1 ODZ Settlements is “two floors without underlying basement”. Does the underlying basement refer to basement above street level? Or if the basement is completely below street level it is acceptable?	A basement completely under street level is acceptable as the aim of the policy was to safeguard the local rural streetscape. Care must be however exercised in situations where there is a considerable difference in level between the front elevation and the back elevation of the building, in which case, the context of the adjoining buildings at the back elevation also needs to be taken into account.
8.5c Map 14.12-C - interpretation of 4.25m recess	Map 14.12.-C includes an area around the Xaghra Circle with a grey band. The legend indicates that “only where penthouses are permissible, building height to be recessed by 4.25 metres from back elevation.” Does this mean that the second floor is to be setback by 4.25 metres from the back elevation? Or does the 4.25m setback refer to the usual 1.8 metre setback required at penthouse level and this is being extended to 4.25m?	The policy refers only to penthouses and not to other floors ie. a recess of 4.25m instead of the normal 1.8m. The 4.25m setback from the front would also be applicable.
8.5d Interpretation of GZ-EDGE-1 and GZ-EDGE-2	Cross reference to Appendix 1 in Policy GZ-EDGE-1 and GZ-EDGE-2 not clear.	Refer to Section 3 in Appendix 1 on page 171-173 for Interpretation.

8.5e Interpretation of policy GZ-Zbug-1	100 sq. m interpretation for Marsalforn in Gozo in policy GZ-Zbug-1. What happens when there are two plots which have more than 100 sq. m footprint and these are separated by a plot having less than 100 sq. m if the intervening plot applies for development permission. According to the policy as written, no development can be allowable in this area unless the footprint is more than 100 sq. m and this could result in two unsightly party walls and an unsightly gap in the skyline.	<p>Reference to the supporting text to the policy indicates the rationale of the policy to ensure a minimum standard. The following interpretation should be given when applying policy GZ-Zbug-1.</p> <ol style="list-style-type: none"> 1) The 100 sq. m. condition will be applicable to Development Planning Applications (DPAs) involving development on vacant sites and proposals to demolish an existing building and erecting a replacement building 2) In cases where a non-residual vacant site does not satisfy conditions of either GZ-Zbug-1 (a) or (b), and it is proven that restricted dimensions of the vacant site did not result through interventions (including those arising from development planning permits or actual construction) after the approval date of the GCLP, then through policy GZ-GNPR-1 (c) and (d), one may interpret through the provisions of planning policy NHGT07 in the NHLP, as applicable to such cases. In such cases, the penthouse would not be allowable unless the floor below the penthouse level is not integrated as a duplex unit as indicated in 3) below. Note: for the purpose of this interpretation, a residual site is a site which may be left over after the rest of the vacant site is parcelled into plots which satisfy the minimum dimensions required by GZ-Zbug-1 3) In cases where the Development Planning application involves the addition of storeys over the existing built structure, up till the allowable height limitation, the proposed building will be allowed to reach height limitation provided that the thrust of policy NHGT07 in the NHLP is observed. In such cases, if the proposal includes a residential unit which overall has a covered floor space exceeding 100 square meters (e.g. a duplex unit), then additional floors up to and including the penthouse level may be considered provided that : <ol style="list-style-type: none"> a) The access to the upper level of the duplex unit needs to be clearly indicated as occurring from within the residential unit (and not from common circulation areas) and; b) After planning permission is awarded, requests to sanction “as built” will not be favourably considered if it transpires that the “as built” version would allow conversion of the duplex unit into two or more separate dwelling units.
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B. PROCEDURE

REFERENCE	OLD PROCEDURE	NEW PROCEDURE	REMARKS
1. What happens when I come across an error in a local plan?	N/a	Send an e-mail to "Planning Queries" including details of the difficulty with interpretation, procedure, etc.	The feedback from these e-mails will be discussed internally and formalised through dissemination through an internal folder. Later on, a folder based on similar lines would be available through the MEPA website.
2. What happens when there is a contradiction between Maps in a Local Plan?	N/a	Send an e-mail to "Planning Queries" including details of the difficulty with interpretation, procedure etc.	The feedback from these e-mails will be discussed internally and formalised through dissemination through an internal folder. Later on, a folder based on similar lines would be available through the MEPA website.
3. How shall applications which were previously ODZ but which have been now included within the Development Zone through the Parliamentary resolution to be processed ?	N/a	These need to be processed separately from the rest of the applications. The procedure for addressing these applications is guided through the provision of LN71/07	Layout, zoning, alignment and other planning parameters will, in most cases, be determined through a PC application. The procedure outlined in LN71/07 will now apply.
4. The Local Plans do not show conditions for alignment front gardens, etc. What should be referred to in order to determine these parameters?	Looking up the TPS data to determine there was a front garden, etc.	Still look up TPS data. TPS data should be regularly updated to factor for approvals emerging from PC applications etc. Each approved PC application should be cross referenced to the Map server database as soon as possible to alert plotters and case officers of the approved changes. Changes effected through a PC application will in the future be cross referenced to the electronic approved Local Plan documents.	Initially the process of migrating data from the Local Plan to the Map server is envisaged to take some time. Where doubts or difficulties arise, consultation should be undertaken with the respective Local Plan Team Manager and with Planning Control.

C. ERRATA CORRIGE

REFERENCE	PAGE	ISSUE	AMENDMENT	REMARKS
1. General				
1.1 All Local Plans – Reference to Primary, Secondary and Tertiary Town Centres and Neighbourhood Centres	N/a	In the policy context, reference to Primary, Secondary and Tertiary Town Centres is found.		Refer to 6.3.
2. NHLP				
2.1 Policy NHPV13 and MAP PV4	N/a	There is a misprint within the policy text of policy NHPV13 Villa Rosa. The policy direction and interpretation is clear and can be easily followed in the zoning of NHLP (2006) Map PV4. The Map however should read Letter 'I' on the green area marked as public open space to the east of Area B. The policy text on the other hand needs to refer to Zone I for 'Open Area fronting the Bay' and Zone H for the 'Ancillary Facilities' area.	Letter I to be shown on green area on MAP PV4. Policy NHPV13 needs to refer to Zone I for "Open Area fronting the Bay" and Zone H for the "Ancillary Facilities"	
3. NWLP				
3.1 NWLP Map B6.1	N/a	The change at Map B6.1 at Dingli of the road north to Tac-Carruta since this is without circle and is not fully shown.	The width of the newly proposed amended road should be extrapolated outside the Map.	
3.2 NWLP policy NWSP 4	p. 180	Policy NWSP 4 in the approved version of the text makes a cross reference to policy NWCM 3 (i), (ii) and (iv) as the approved uses on the Foreshore within the Entertainment Priority Area of Bugibba.	In NWSP 4 cross reference should be to NWCM 3 (iii), (vi) and (ix) - basically Class 4, 6 and 9 uses are the acceptable uses in the zone covered by NWSP 4.	This list refers to an older draft of NWCM 3 and the correct cross reference should be NWCM 3 (iii), (vi) and (ix) - basically Class 4, 6 and 9 uses are the acceptable uses in the zone covered by NWSP 4.
3.3 NWLP Map 28- Mellieha West Building Heights	N/a	Frontage on Triq Gnien Ingraw of block between Triq is-Santwarju and Triq San Pawl do not have an indicated height limitation.	Frontage on Triq Gnien Ingraw of block between Triq is-Santwarju and Triq San Pawl needs to have a height limitation of three floors plus 3 courses basement. Penthouse also allowed.	
3.4 NWLP Map 57 - Ghajn Tuffieha Area Policy	N/a	Unclear boundary for site indicated as "Redevelopment Area in Lieu of Golf Course - Subject to Development Brief"	The boundary of the "Redevelopment Area in Lieu of Golf Course - Subject to Development Brief" needs to be amended to include all the site covered by policy NWGT 4 in the public consultation draft ie the Airmalta site.	
3.5 NWLP –Policy NWNA 7	p. 208	Reference to need for Structure Plan Review in last line of policy	The requirement for a Structure Plan Review should be deleted.	This area has the same features as an Area of Containment. In the NWLP , Areas of Containment were not deemed to require a Structure Plan review in view of the level of commitment present in such areas. The same applies in this particular area. During the Local Plan MEPA board debates, MEPA has confirmed that given that in general committed Industrial areas have been longstanding feature in the Maltese countryside, and therefore they do not

REFERENCE	PAGE	ISSUE	AMENDMENT	REMARKS
				need to be reviewed through a Structure Plan review Process.
4. CMLP				
4.1 CMLP - Policy MO04 and MAP MOB7	p. 115	There is a discrepancy between the height limitation indicated by policy MO04 (i.e. 3 floors plus semi-basement) and that indicated on MAP MOB7 (two floors)	The provision indicated in policy MO04 should prevail, subject that penthouses should not be allowed in this area and that development adjacent to Triq id-Difiza Civili would be limited to two floors for a depth of 25m.	The reason for having the policy prevail lies with the fact that an adjacent industrial area has a height limitation of three floors; that adjacent residential areas have a height limitation of three floors and therefore it is sensible to maintain the continuity aspect. However, to soften the edge at Triq id-Difiza Civili, a band of two floors would be sensible to soften the edge of the area of containment.
5. SMLP				
5.1 SMLP Maps ZN 1,2 and 4	N/a	There is a mistake of the size of the green area at Misrah Mikiel Anton Vassalli, Zejtun on the Local Plan document at Maps ZN 1,2 & 4 There is no indicated changes to the scheme at appendix A.	Green area as shown in TPS should apply.	The TPS shows a smaller green area since part of it was given for development.
5.2 SMLP Policy SMHO 02	p. 28	States that <i>'in the residential areas of Kirkop and Xghajra no dwelling unit will be permitted having a net floor area less than 120m². However, where proposals will result in the creation of more than two units on the same footprint, smaller units may be permitted ...'</i>	Should read <i>"However, where proposals will result in the creation of NOT more than two units on the same footprint, smaller units may be permitted ..."</i>	The idea was to give a degree of flexibility to smaller scale development for individual owners who to have smaller built footprint but a greater degree of private open space.
5.3 SMLP – Policies SMSE 06, SMSE 07 – Category 1 and Category 2 ODZ settlements	p. 13-16	Reference to requirement that these settlements are to be considered during the next Structure Plan Review	In line with the rest of the Local Plans, the requirement for a Structure Plan Review should be deleted.	Practically all the ODZ settlements were in place by the time the current Structure plan was approved way back in 1992 and therefore constitute "existing development". Their planning status has long been debated within MEPA. The published Rural Topic Paper confirms their legitimacy as elements within the Maltese countryside. During the Local Plan MEPA board debates, MEPA has confirmed that given that in general these have been longstanding feature in the Maltese countryside, they do not need to be reviewed through a Structure Plan review Process.
5.4 SMLP – SMHF 02 – Hal Far Transport and Access Improvement Policy	p. 199	Internal road network has been removed from policy MAP HF 1 but reference to it is still made in policy SMHF 02.	Since internal road network has been removed from policy MAP HF 1 first sentence in second paragraph in policy SMHF 02 is to be deleted.	
5.5 SMLP – MAP GH 2 – Building Heights Ghaxaq	N/a	Alignment at Triq il-Barbazzal (Ghaxaq) on Building Heights Map GH 2 does not reflect the amendment made in MAP GH A3.	Proposal at Triq il-Barbazzal (Ghaxaq) on MAP GH 2 should reflect amendment in MAP GH A3.	
5.6 SMLP – Maps K11, MA3, QR3, SI4 and SI5. – Environmental Constraints Map - reference to policy SMIA 09	N/a	Incorrect reference to policy SMIA 09 in in Maps K11, MA3, QR3, SI4 and SI5	The correct reference in Maps should be SMIA 11 instead of SMIA 09.	

REFERENCE	PAGE	ISSUE	AMENDMENT	REMARKS
6. GCLP				
6.1 GCLP Maps 14.12 A, C, D and F	N/a	Green area between Triq Tal-Qacca and Triq Ta' Hamet. Shown as green area in MAP 14.12-A but as GZ-EDGE-2 area in MAP 14.12-C, as a Design Priority Area in 14.12-D	Interpret as actually existing in 2006.	Given that there is a recently erected building on this area plus a small green area on the eastern flank, it would be proper to interpret as actually built.
6.2 GCLP Maps 14.7-A, C, D	N/a	Disagreement between extent of green area between indicated Maps.	Maps 14.7-C and D are to be interpreted as the correct extent	Given that a permit for a belvedere has been issued on this site, the extent indicated in Maps 14.7-C and D are to be interpreted as the correct extent .
6.3 Index to Maps	N/a	Reference to area policy Maps relating to UCA street Classification (XXX-F Maps) are incorrectly indicated after Map 14.3-F	These should have the second digit reference identical to the preceding Map.	
6.4 GCLP Maps 14.7C and 14.7D	N/a	There is a discrepancy between Maps 14.7C in terms of the extent of the building heights and the corresponding areas reflecting GZ-EDGE-1 conditions in MAP 14.7D in the area near Triq it-Torri ta' Kenuna – Nadur. Moreover, in MAP 14.7D there is an area which is not looking towards an ODZ area but is indicated as a Development Zone Edge area.	Both MAPS should be interpreted in the spirit in which GZ-EDGE-1 was written. Areas overlooking an ODZ area should have the policy applicable only for the depth or width of the last plot lying adjacent to the edge of the development zone boundary and facing the ODZ area. Also refer to Section A 8.5a.	A similar correction had already been undertaken at Qala in Map 14.8-D from the draft for public consultation version to the current approved version. Also refer to Section A 8.5a
6.5 GZ-EDGE-1 and Maps 14.14-C1 and 14.14-D1	p. 25	Height limitation on MAP 14.14-C1 indicates a height limitation of 4 floors and six courses basement whilst on certain areas, MAP 14.14-D1 indicates that policy GZ-EDGE-1 is applicable.	The height limitation indicated in MAP 14.14-C1 should prevail. Also refer to Section A 8.5a.	Policy GZ-EDGE-1 clearly indicates that it is intended for those areas where the Development Zone edge is either still predominantly dominated by two storey dwellings or it lies near a ridge edge but is separated from the edge by a carriageway. In Marsalforn, the Development Zone edge is already committed for tourism development and does not generally retain the traditional characteristics of other settlements. Therefore MAP 14.14.C1 should prevail.
6.6 Maps 14.15-A and PC Map 2a.15.2	N/a	Maps 14.15-A and PC Map 2a.15.2 Fontana have varying TPS boundary interpretations.	Correct interpretation is the Policy Map 14.15-A in this case as the PC boundary verges into the NATURA 2000 site. Furthermore the Rationalisation Exercise (2006) boundary prevails	
6.7 Map 14.6-A - Munxar the Open Air Recreational Area	N/a	Map 14.6-A Munxar the open air recreational area (near area known as Tal-Gebel) is not shown in key	The missing colour is the same adopted for other Maps under heading "Open Air Formal Recreational Area – GZ-RECR-4 (eg. On Map 14.6-A1)	
6.8 Height limitation on Map 2a.7.2 and zoning conditions on Map 14.7-A and heights on Map 14.7 C	N/a	In Map 2a.7.2 of Planning Control Maps for Nadur, one of the houses has been earmarked as a bungalow whilst on Map 14.7-A it is shown as semi-detached villas with 40% coverage	In terms of zoning and height limitation, the provisions of Maps 14.7-A and 14.7-C should prevail.	
6.9 Applicability of GZ-CMRC-6 to Ta' Dbiegi	N/a	MAP 14.3-A refers to Policy GZ-CMRC-6, however, the Policy refers only to Xewkija and not Gharb.	This is an error. The same principle should be applicable to Ta' Dbiegi.	