

Environmental Impact Assessment

Screening

(According to S.L. 549.46)

PA file no.: PA 03807/17

Other reference: EA 00007/17

Project Title: Proposed City Centre multi-use development, including 5 Star Hotel (464 rooms) Class 3B, 158 residences, commercial office space (Class 4A), shopping mall (Class 4B) & restaurants (Class 4C and 4D) and basement car park.

Location: Former ITS Site, Wesghet George Portanier & Wesghet Lewis V. Farrugia, Triq il-Profes Walter Ganado, Triq ix-Xatt ta' San Gorg, San Giljan / Pembroke

Screening date: April 2017

1. Description of Proposal

1.1 Outline of project/development

PA 03807/17 is an application to convert the former ITS site into a multi-use development consisting of a car park, residential tower, shopping complex, hotel, and surrounding amenities such as conference facilities, restaurants, Hard Rock Café, nightclub, casino, spa and fitness facilities, public plaza, valet parking, swimming pools, wedding reception hall, and Skybar located at the Former ITS Site & Wesghet George Portanier, San Giljan / Pembroke

The development is located in St George's Bay, St Julians and Pembroke. It will cover a total site area of 23,975m² with a total Gross Floor Area of 115,352m² and be split into three (3) areas:

- Site A, measuring 5,536m², is currently an open site, which is earmarked for a car park, high quality residential and some commercial in the North Harbours Local Plan;
- Site B, measuring 18,202m², is the area around and including the current ITS building;
- Site C, measuring 237m², is a small site located next to the coast and adjacent to the Marina San Gorg Hotel.

According to the proposal, site A will be used exclusively for car parking, with more parking being provided on the eastern part of Site B. Site B will also include the residential tower, shopping complex, hotel, and surrounding amenities such as conference facilities, restaurants, Hard Rock Café, nightclub, casino, spa and fitness facilities, public plaza, valet parking, swimming pools, wedding reception hall, and Skybar. Site C will be integrated with the proposed development by enhancing the natural beach environment and adding a temporary Lido Structure for the provision of amenities (food prepared off site, umbrellas, sunbeds etc.).

Water, sewage and electrical services are readily available.

1.2 Site description and related considerations

Developments in the surrounding vicinity consist of mainly residential and commercial areas, with some natural areas. The Pembroke residential area lies to the North of the site, while commercial activities related to the Paceville touristic area, namely hotels, bars, and restaurants, are directly adjacent to the West and East of the proposal. The South of the site is characterised by the marine area of St. George's Bay.

Furthermore, the proposal is located:

- i. partially above the Ħarq Ħammiem cave system, a scheduled Level 1 Area of Ecological Importance and Site of Scientific Importance (G.N. 370 of 2008);

- ii. 300m from Wied Harq Hammiem, a scheduled Level 1 Area of Ecological Importance and Site of Scientific Importance (G.N. 370 of 2008), which is also a Special Area of Conservation of National Importance (MT 150);
- iii. about 100m from it-Torri ta San Gorg, a scheduled Grade 1 scheduled Military Tower (G.N. 783 of 1995);
- iv. 150m from the Pembroke Coast & Karstland, a scheduled Level 3 Area of Ecological Importance (G.N. 583 of 1996), which is also a Special Area of Conservation of International Importance (MT 002);
- v. about 300m from St. George's Barracks, a scheduled Grade 2 scheduled Military barracks (G.N. 880 of 2009);
- vi. about 250m from 'A' Pistol Range, a Grade 1 scheduled pistol range (G.N. 880 of 2009); and
- vii. directly adjacent to the Zona fil-Bahar fil-Grigal ta' Malta at St. George's Bay, a Special Area of Conservation of International Importance (MT 105).



Figure 1: Location of the site earmarked for the proposed development (Source: PA Mapserver)



Figure 2: Close-up of the site and its immediate surroundings (Source: PDS)

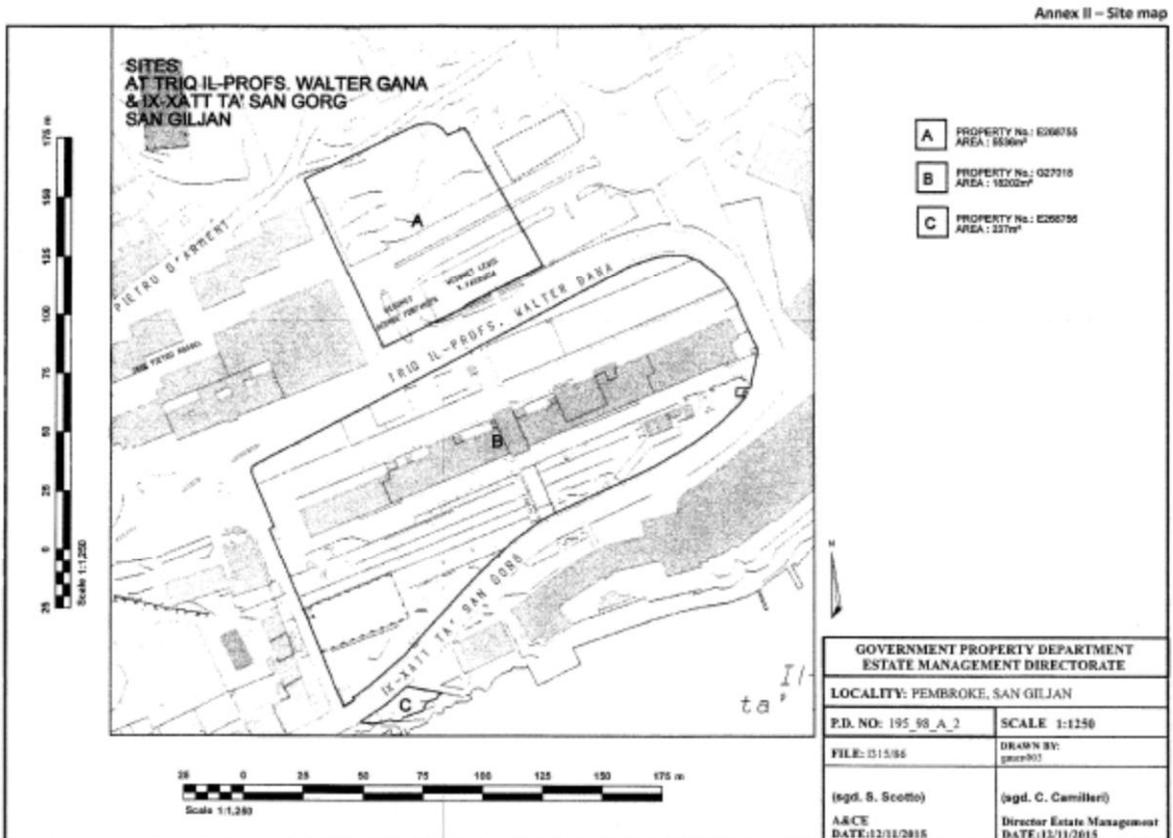


Figure 3: Plan showing the site breakdown – Site A: Parking area, Site B: Residential tower, shopping complex, hotel, and other amenities, Site C: Temporary lido (Source: PDS)

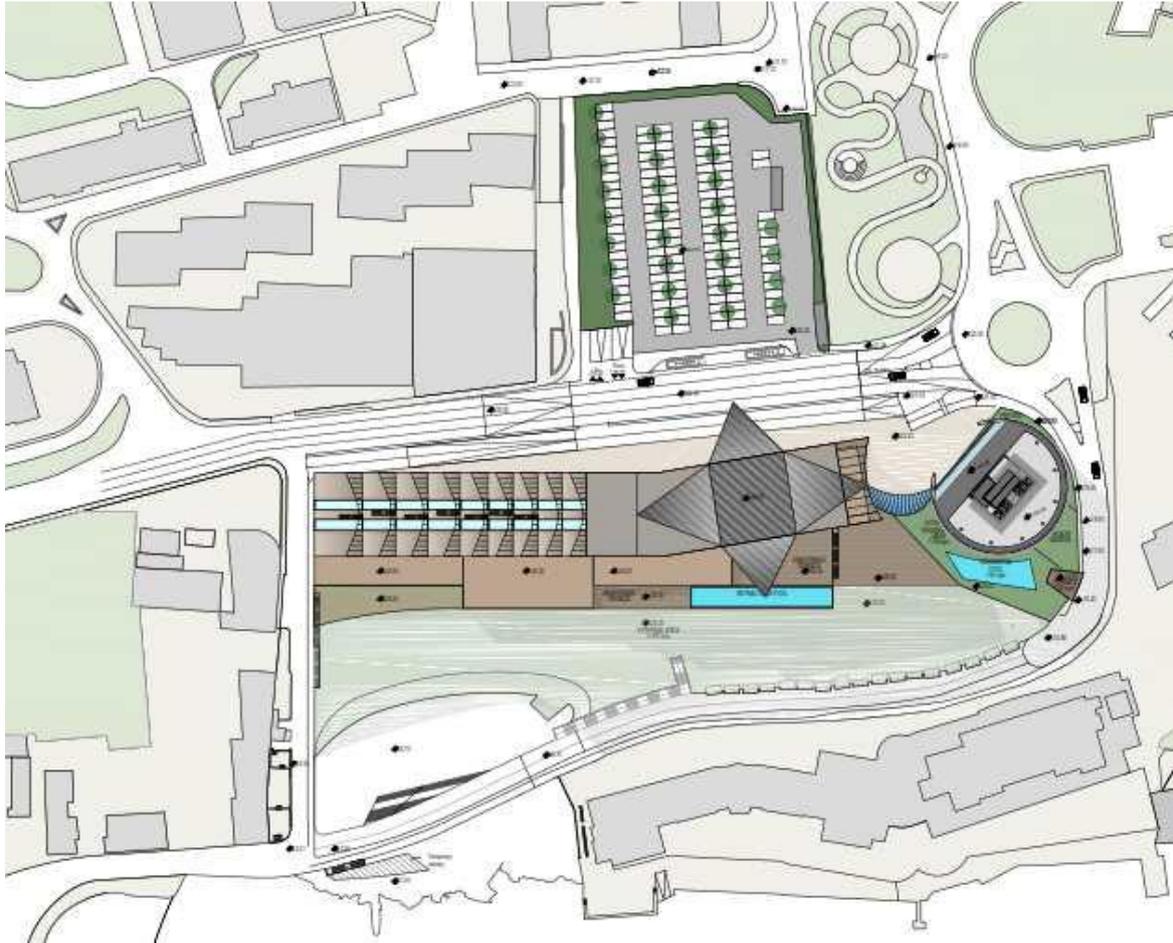


Figure 4: Masterplan of the proposed development (Source: PDS)

2. EIA-relevant history

2.1 EIA screening criteria (citations refer to S.L. 549.46 except where otherwise specified):

At ERA screening stage, the proposed development was deemed to require a Project Description Statement (PDS) has a site area of approx. 24,000m², a Gross Floor Area of approx. 115,000m², and a hotel with around 900 beds in accordance with Schedule 1A, Category II, Section 3.3.2.1 of the Environmental Impact Assessment Regulations, 2007 (S.L. 549.46).

2.2 Version of documents used for screening:

1. PDS dated 4th April 2017.

3. Screening Matrix

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
1	Will construction, operation or decommissioning of the Project involve actions	Yes. The site area is located within an area zoned for development, covering an area of approx. 24,000m ² . The site is easily serviced by	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes. The proposal will result in a major intensification of built development and	PDS Pgs. 5-9

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
	which will cause physical changes in the locality (topography, landuse, changes in water bodies, etc)?	adjacent roads. The proposal will further intensify an average-density area (ITS school) into a high-density one (hotel, commercial, residential, and offices) with a significant increase in building heights (from one/two storey into twenty and forty storey buildings). The majority of the site will be excavated to make space for ancillary facilities such as underground parking, thus resulting in the physical change of the topography (about 380,000m ³ of rock are to be excavated). Excavation and construction will take place very close to Wied Harq Hamiem and the St. George's bay coastal area, and above the deep cave of Harq Hamiem.	building heights in the area. Potential impacts on the underlying Harq il-Hamiem cavern (damage from construction-phase vibration; operational-phase disturbance) resulting from the intensive development on the southern/south-western part of the site is unclear. Therefore further studies on such potential impacts (geology, geomorphology, hydrogeology, water quality and cave ecology) are required.	
2	Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	Yes. The proposed project will make use of natural resources such as <i>franka</i> stone blocks, land, cement, steel, fuel, electricity and water which are non-renewable.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>Although the amount of raw material required for construction has not been quantified, when considering the size and scale of the project, the amounts used are expected to be significant.</p>	PDS Pgs. 48-49
3	Will the Project involve use, storage, transport, handling or production of substances or materials or energy, especially any resources which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?	Yes. Given its scale, the proposal will generate fugitive dust emissions during construction and NO _x and PM ₁₀ from the operational traffic. If not properly managed, such emissions have the potential to impact adjoining residential neighbours, Wied Harq Hamiem and the coastal water body.	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear. The amount of dust (during construction) and NO_x and PM₁₀ (during operation) and their significance to potentially negatively impact the surrounding residential neighbours, the adjoining valley, and the coastal water body is unclear. Therefore further studies on such potential impacts (air quality, ecology, water quality) are required.</p>	PDS Pgs. 57-65

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
4	Will the Project produce solid wastes during construction, operation or decommissioning?	<p>Yes. Solid waste will be generated during both construction and operation.</p> <p>Waste arising during construction will consist of demolition, excavation and construction waste.</p> <p>During operation, the proposal will mostly generate municipal waste.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>Yes. Although the amount of raw material required for construction has not been quantified, when considering the size and scale of the project, the amounts used are expected to be significant.</p> <p>Any waste during operation shall be adequately managed and absorbed into local waste streams.</p>	PDS Pgs. 48-50
5	Will the project release pollutants or any hazardous, toxic or noxious substances to air?	<p>Yes. During construction: fugitive dust emissions from site clearance and excavation and exhaust (including NO_x and PM₁₀) from construction vehicles.</p> <p>During operation: NO_x and PM₁₀ from operational traffic to and from the residences, offices, and commercial outlets.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear. The scale and significance of the amount of pollutants (fugitive dust, NO_x) on the surrounding residential neighbours, valley, and the coastal water body (proposal boundary is less than 20 metres from shoreline), during both construction and operation could not be identified and therefore further studies are required.</p>	PDS Pg. 48-50, 65
6	Will the Project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	<p>Yes. Noise and vibration during construction (site clearance, excavation and construction) phase will be generated. Vibration during the construction phase may affect the integrity of Harq Hamiem cave which lies directly below the proposed site.</p> <p>During operation, noise (from traffic), light (from commercial outlets, and hotel) and shadowing especially on beach (from the height of hotel and residential tower) are expected.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>During construction works, vibration-intensive rock excavation may negatively impact the underlying cave thus resulting in damage or collapse. In the event of such occurrence, impact is very significant.</p> <p>During operation, it is yet unclear as to the expected number of traffic generated as a result of the proposal. Furthermore, given its proximity to the valley and coastal area, impacts from light, noise and shadowing on these areas are unclear.</p>	PDS Pg. 57-65
7	Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	<p>Yes. The development lies 300m from Wied Harq Hamiem and the coastal zone of St. George's bay, and above Ghar Harq Hamiem.</p> <p>Therefore, the proposed development may negatively impact these distinct water bodies during both construction and operation phases (as a result of silt-laden construction-site runoff,</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear. The excavation and construction will result in the physical change of the topography and configuration of the area, thus potentially leading to contamination of the surrounding water bodies. The scale and significance of impacts (e.g. surface water runoff, percolation, and foul water) generated as a result of the proposed project towards the freshwater flooded cave, could not be identified and therefore further studies are required.</p>	/

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
		longer-terms urban/street runoff, and percolation through subsurface joints and fissures).	Furthermore, no details were provided as to the potential discharges into the coastal water and their respective mitigation measures.	
8	Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	Yes. The site lies above the large cave at Harq il-Hamiem and therefore works (especially through vibrations) may result in the collapsing of the cave. Furthermore, spillages and dust emissions during construction and operations may negatively impact the adjacent residential area, and the St. George's Bay coastal area.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Unclear impacts are envisaged. Refer to Questions 1, 3, 6, and 7.	/
9	Will the Project result in social changes for example, in demography, traditional lifestyles, employment?	Yes. The proposal will further intensify an average-density area (ITS school) into a high-density one (hotel, commercial, residential, and offices) with a significant increase in building heights (from one/two storey into twenty and thirty storey buildings). The project will also employ about 1,500 people, provide 150 residences, and include a hotel of 900 beds.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Unclear. Although the proposal is within an already well-established development zone, a number of potential impacts may arise, such as an increase in traffic resulting from the increased number of people.	PDS Pgs. 5-9, 46
10	Are there any such factors which should be considered such as the consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?	Yes. The proposed development at Villa Rosa is located nearby, very close to the CityCentre development. The two proposed major projects may have all-round cumulative impacts on the surrounding area area. Furthermore, the opening of a large car park is also expected to further encourage vehicular traffic in the area, thus exacerbating both the existing issues and envisaged additional pressures in terms of air quality. The required access to the proposed car park is also expected to constrain future plans for the management of the immediate hinterland of the	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes, significant cumulative impacts (e.g. traffic, visual amenity, infrastructural carrying capacity, etc) are envisaged in terms of impacts when taking into account the Villa Rosa and the City Centre proposals combined.	/

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
		beach at St. George's Bay.		
11	Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?	Yes, the proposal is located; (i) partially above the Ħarq Ħammiem cave system, a scheduled Level 1 Area of Ecological Importance and Site of Scientific Importance (G.N. 370 of 2008), (ii) 300m from Wied Ħarq Ħammiem, a scheduled Level 1 Area of Ecological Importance and Site of Scientific Importance (G.N. 370 of 2008), which is also a Special Area of Conservation of National Importance (MT 150), (iii) about 100m from it-Torri ta San Gorg, a scheduled Grade 1 scheduled Military Tower (G.N. 783 of 1995), (iv) 150m from the Pembroke Coast & Karstland, a scheduled Level 3 Area of Ecological Importance (G.N. 583 of 1996), which is also a Special Area of Conservation of International Importance (MT 002), (v) about 300m from St. George's Barracks, a scheduled Grade 2 Military barracks (G.N. 880 of 2009), (vi) about 250m from 'A' Pistol Range, a scheduled Grade 1 pistol range (G.N. 880 of 2009), and (vii) directly adjacent to the Zona fil-Bahar fil-Grigal ta' Malta at St. George's Bay, a Special Area of Conservation of International Importance (MT 105)	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear impacts are envisaged. Refer to Questions 6 and 7.</p> <p>Furthermore, the proposed development lies close to the various scheduled British Military structures forming part of the Pembroke military complex. Features within the site are the main items of cultural heritage value that may be directly impacted by the proposed development.</p> <p>Impact on other surrounding features is unclear. The proposed development may also pose certain degrees of impacts (visual impact, damage due to transport/access during construction).</p>	/
12	Are there any areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands,	Yes, the proposal is located; (i) partially above the Ħarq Ħammiem cave system, a scheduled Level 1 Area of Ecological Importance and Site of Scientific Importance (G.N. 370 of 2008), (ii) 300m from Wied Ħarq Ħammiem, a scheduled Level 1 Area of	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear impacts are envisaged. Refer to Questions 6 and 7.</p>	/

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
	watercourses or other water bodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?	Ecological Importance and Site of Scientific Importance (G.N. 370 of 2008), which is also a Special Area of Conservation of National Importance (MT 150), (iii) 150m from the Pembroke Coast & Karstland, a scheduled Level 3 Area of Ecological Importance (G.N. 583 of 1996), which is also a Special Area of Conservation of International Importance (MT 002), and (iv) directly adjacent to the Zona fil-Bahar fil-Grigal ta' Malta at St. George's Bay, a Special Area of Conservation of International Importance (MT 105).		
13	Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?	Reply to Question 12 refers. While no impacts have yet been identified, vibration, noise, light, water runoff and dust dispersion may affect the flora and fauna in all these areas.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Unclear impacts are envisaged. Refer to Questions 6 and 7.	/
14	Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Yes. Replies to Question 7, 11 and 12 refer.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Yes. Replies to Questions 7, 11 and 12 refer.	/
15	Are there any areas or features of high landscape or scenic value on or around the location which could be effected by the project?	No such areas are known of.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged.	/
16	Are there any routes or facilities	Yes. The site lies within the frequently visited area of	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/>	/

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
	on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	<p>Paceville and the St. George's Bay coastal area.</p> <p>The proposal will further intensify an average-density area (ITS school) into a high-density one (hotel, commercial, residential, and offices).</p> <p>The project will also employ about 1,500 people, provide 150 residences, and include a hotel of 900 beds.</p> <p>Thus, during both construction and operation, the proposal is expected to generate traffic to and from the site.</p>	The expected increase in traffic during both construction and operation is unclear and therefore the likely significant effects of the proposal on access is unclear.	
17	Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Yes. The roads surrounding the proposal (Triq ix-Xatt ta San Gorg and Triq il-Professur W. Ganado) are constantly used by commuters and susceptible to congestion especially in the weekend.	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <hr/> <p>Unclear. Reply to Question 16 refers.</p>	/
18	Is the project in a location where it is likely to be highly visible to many people?	Yes. The proposal is located within the Paceville/Pembroke residential area and adjacent to Triq ix-Xatt ta' San Gorg and thus will be visible to most of the people travelling along this road.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Yes. Significant impacts are envisaged given the proposal's scale and height (from one/two storey into twenty and forty storey buildings) even though it lies within an existing Development Zone.</p>	/
19	Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	Yes. Reply to Question 11 refers.	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <hr/> <p>Unclear. Reply to Question 11 refers.</p>	/
20	Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes. The project lies within an area zoned for development, and is mostly already committed. However, Site B will convert a small agricultural land parcel into a parking area.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>No. The agricultural area to be converted is relatively small, and already within an approved development zone.</p>	/

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
21	Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	<p>Yes. The site is situated within the Paceville built-up area which is a highly touristic and recreational area. It is also adjacent to Pembroke residential area.</p> <p>Residents, tourists, and recreational visitors to the area may be affected by the proposed project in terms of issues that are typically encountered vis-à-vis new development within existing built-up areas (e.g. air quality, vibration, noise emissions and an increase in the frequency of heavy vehicles accessing the site during the construction phase and increase in traffic during the operational phase).</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>The amount of dust (construction) and traffic emissions (operation) and their significance to potentially negatively impact the surrounding residential neighbours, commercial activities, valley, and the coastal water body is yet unclear.</p>	/
22	Are there any plans for future land uses on or around the location which could be affected by the project?	No such plans are present within the area of influence of the proposed development.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No significant impacts are being envisaged.</p>	/
23	Are there any areas on or around the location which are densely populated or built up, which could be affected by the project?	<p>Yes. The site is situated within the built-up area of Paceville and adjacent to Pembroke. Local residents may be affected by the proposed project in terms of issues that are typically encountered vis-à-vis new development within existing built-up areas (e.g. air quality, vibration, noise emissions and an increase in the frequency of heavy vehicles accessing the site during the construction phase and increase in traffic during the operational phase).</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Unclear. The amount of pollutants (fugitive dust, traffic emissions) and their significance to potentially negatively impact the surrounding residential neighbours is unclear. During operation, it is yet unclear as to the expected number of traffic generated as a result of the proposal.</p>	/
24	Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places	No such areas are known of.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No significant impacts are being envisaged.</p>	/

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
	of worship, community facilities which could be affected by the project?			
25	Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	Yes. Refer to Questions 1, 7, 11 and 12.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Replies to Questions 1, 7, 11 and 12 refer.	/
26	Are there any areas on or around the location which have already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	Yes. The proposal is within an area which is already subject to heavy traffic flow, with consequent air quality implications. Furthermore, it is unclear whether the water quality status of the St. George's Bay coastal area is within the legal environmental standards for a Special Area of Conservation of International Importance.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Unclear. The proposal may lead to further intensification of the area thus resulting in further exceedance of legal environmental standards. Replies to Questions 1, 7, 11 and 12 refer.	/
27	Is the project location susceptible to earthquakes, or subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	Yes. The project may lead to subsidence of the roof on the large subterranean cavern at Harq il-Hamiem.	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> The risk of subsidence on the large subterranean cavern at Harq il-Hamiem is currently unclear.	/

4. EIA Screening Conclusion and recommended way forward

4.1 EIA screening conclusion

The above EIA screening matrix indicates that the proposed development would qualify for an EIA as per Schedule IA, as per Schedule IA, Category II Section 3.9.2.2 of the EIA Regulations, 2007 (S.L. 549.46), which would need to address the following aspects:

- Potential impacts on the large subterranean cavern at Ħarq il-Ħamiam;
- Potential impacts on Wied Ħarq Ħamiam;
- Potential impacts on the St. George's bay coastal area;
- Potential cultural heritage impacts;
- Fugitive dust, traffic emissions, noise, vibration and waste arising from the proposal;
- Intensification of urban development near the coast in an area which is already densely developed;
- Cumulative impacts on the surrounding area of influence; and
- Impacts on the visual amenity of the area.

In the light of the above, it is confirmed that:

1. The proposed development qualifies for an EIA (EPS); and
2. The envisaged impacts of the proposal are such that the development cannot be exempted from such EIA requirement.

4.2 Screening Disclaimer

The above screening results, the ensuing conclusions and recommendations are without prejudice to any required changes or updates should the development proposal be eventually modified or should the information/assumptions provided turn out to be incorrect. Any deviations of the proposal from this submission would need to be re-assessed and the merits of this screening would need to be re-opened.