

[REDACTED]  
Planning Authority  
St. Francis Ravelin  
Floriana FRN 1230

15<sup>th</sup> September 2016

Dear [REDACTED]

**GCLP Partial Local Plan Review May 2016: SEA Screening  
Consultation in terms of Regulation 4(6) of the Strategic Environmental  
Assessment Regulations, 2010 (Legal Notice 497 of 2010)**

Reference is made to the SEA Screening consultation on the partial review of the Gozo and Comino Local Plan which the Environment and Resources Authority (ERA) received by email on 19<sup>th</sup> August 2016.

I am enclosing ERA's comments on the potential significant environmental impacts of the proposed 'Partial Review of the Gozo and Comino Local Plan (2006) as amended in 2011: Gozo General Hospital Site Final Draft (May 2016)'. These environmental issues should be taken into account in determining whether the proposed Local Plan policy review requires an SEA in accordance with the Strategic Environmental Assessment Regulations, 2010 (Legal Notice 497 of 2010).

Yours sincerely,



Perit Ruben Abela  
Chief Executive Officer  
Environment and Resources Authority

**ERA's comments on SEA Screening of the Partial Review of the Gozo and Comino Local Plan (2006) as amended in 2011 – Gozo General Hospital Site Final Draft May 2016**

**12<sup>th</sup> September 2016**

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**1. Introduction**

- 1.1 The Environment and Resources Authority (ERA) notes the proposed revisions to policies relating to Health, Government Centralised Offices Area and the Health Related Services and Facilities as part of the partial review of the Gozo and Comino Local Plan. ERA welcomes the opportunity to comment on the likely significant environmental impacts of the Final Draft Local Plan Review in line with Regulation 4(6) of the Strategic Environmental Assessment Regulations, 2010 (Legal Notice 497 of 2010).
- 1.2 ERA's SEA response is provided in three parts: the first part addresses concerns regarding the lack of strategic and holistic approach to various Local Plan revisions in Rabat and the potential cumulative and synergistic impacts that separate policy revisions could have on the environment. The second part deals with the proposed changes to policy GZ-SOCF-3 regarding local health facilities across Gozo, whilst the third part focuses on the proposed new policy GZ-Rbat-11 regarding further development at Gozo's General Hospital site.
- 1.3 It is noted that policy GZ-Rbat-8 is being amended to remove references to Health and the Gozo General Hospital which are now covered by the new policy GZ-Rbat-11.

**2. Gozo Local Plan Reviews: Development Sites in Rabat**

- 2.1 There are at least three significant development sites at Rabat which are affected by concurrent Local Plan reviews. These consist of:
- a site in the centre of Rabat for the construction of a new primary school, which will replace the existing school known as Tal-Vajringa, and provision of sports and recreational facilities for the public. This proposal raises questions regarding the future planning of the site currently occupied by the Tal-Vajringa school; and
  - Gozo's General Hospital site which is earmarked for further intensification of development and is the subject of this SEA screening consultation.
- 2.2 Strategically, ERA has concerns relating to the potential cumulative and synergistic impacts that future developments at these sites could have on the environment. For example, these proposals could contribute to increased traffic flows within the area with consequential environmental impacts on air quality and/or future pressures for further road infrastructural works ODZ.
- 2.3 ERA is concerned about these piecemeal revisions to the approved Local Plan policies. When considered collectively, and in combination with the existing land use situation in the area and other proposals in the Local Plan, such piecemeal policy revisions could have significant, cumulative and synergistic impacts on the environment. **Therefore, ERA recommends that all relevant Local Plan**

**policy revisions should be carried out holistically and should be assessed comprehensively through an SEA procedure before any development commitments are agreed in principle at policy stage.**

### **3. Environmental Issues: Local Health Facilities and Centres**

#### **Policy GZ-SOCF-3 Health**

- 3.1 The focus of the revised policy has changed and it raises concerns to how and to what extent this revision would impact the rural environment. The 2011 version of the policy states that “There shall be a general presumption against the location of new health related facilities in areas Outside Development Zones”. The current Local Plan policy, which in turn also raises environmental concerns, does not exclude the possibility that there may be few exceptions meriting consideration ODZ. However, the proposed policy revision is even of more concern since it now categorically favours development proposals for the upgrading of local health facilities and related centres ODZ provided that the sequential approach as provided in SPED has been followed. This shift in policy focus is of significant environmental concern and therefore, strategically, it is unacceptable from an environmental point of view. In addition, ERA is also concerned regarding the possible misuse of studies and site selection exercises to retrospectively justify already chosen sites.
- 3.2 No evidence or justification has been provided to justify the change in approach or to demonstrate that the existing policy approach is no longer appropriate or to how and why the sequential approach is more appropriate. In fact, ERA notes that SPED Gozo Objective 1 (GO1) did not identify the need for the comprehensive upgrading of local health facilities and centres across Gozo as a strategic priority. Moreover, SPED’s Thematic Objective 2 (TO2) focuses on social and community facilities generally and strategically across all of the Maltese territory and therefore, its direct application to Gozo remains unclear.
- 3.3 Thematic Objective 2 of SPED was assessed through the SEA process in July 2015. The SEA process concluded that the allowance of social and community facilities in rural areas, even if these are subjected to the sequential approach, would have a negative impact on the environment. The significance of this impact on the rural environment remained uncertain due to the strategic nature of the SPED policies. The SEA report identifies that one means to address such negative impact is to ensure that “These issues and corresponding safeguards are to be taken forward in the next tier of plan making and internalised in the implementation of other relevant Government plans and policies (SPED Environmental Report, page 110). It is ERA’s view that the sequential approach has merely been adopted without the issue being considered and suitably assessed at Local Plan review level which is the next tier in the hierarchy of planning policies.
- 3.4 No review of the condition of facilities or the need and demand of particular health facilities in Gozo has been provided. This lack of strategic approach to the improvement of local health facilities/service which, alongside the proposed policy approach, is likely to lead to *ad hoc* piecemeal developments due to no definitive strategy to assess development proposals against.
- 3.5 The overall approach of the policy that is being adopted could lead to various sporadic developments occurring ODZ which are favoured on the justification that they provide healthcare facilities with no strategic overview in terms of their

demand or need. At present, although plausible, such strategic environmental impact remains uncertain.

- 3.6 **ERA considers that the approved policy should remain unchanged. Alternatively, the likely significant environmental impacts of such policy revision need to be assessed strategically and this should be based on a comprehensive review of the current situation of local health facilities and associated needs. This strategic assessment needs to be carried out prior to any in principle development commitments at policy stage.**

#### **4. Environmental Issues: Gozo General Hospital Site**

##### **Policy GZ-Rbat-11**

- 4.1 The amended policy aims to accommodate Gozo's main hospital functions to one site by increasing the hospital's capacity and physical size on this site through new development and vertical and lateral extensions to existing buildings.
- 4.2 Through the increased intensification of use and development on the site, there is the potential for certain impacts on the environment. It is noted that the existing site is currently used for hospital/medical purposes and as a result it has certain level of site and strategic infrastructure in place to support this function.
- 4.3 The **potential environmental issues** are considered to be;
- impact on the ridge, geology and hydrology;
  - harm to air quality and emissions into the atmosphere;
  - soil and water erosion and/or contamination
  - green open space; and
  - the lack of Green Infrastructure.

##### **Impact on the ridge, geology and hydrology**

- 4.4 The proposed new policy GZ-Rbat-11 makes provision for "the Planning Authority" to consider "new buildings, redevelopment of existing buildings, not worthy of conservation, on a larger footprint and height and vertical and/or lateral extensions to existing buildings" (page 11) .
- 4.5 A downward sloping ridge abuts the south east boundary of the hospital site. Increasing the height of buildings at the edge of this boundary could have adverse visual impact from the surrounding countryside as well as potential impact on the ridge's geology, other topographic features and its hydrology, including potential construction phase contamination. In this respect, ERA notes that the policy partly addresses this concern by stating that "the site layout should preferably steer additional development away from the south-eastern escarpment and ridge edge". It is also welcome that the policy requires the submission of visual impact studies and ERA would further assess development applications as and when these are submitted to determine whether such projects would have a significant environmental impact. ERA considers that these issues should be taken into account during the design of projects at this site in order to ensure that the ridge edge and its environs are safeguarded. These issues together with other relevant details and

environmental requirements will be assessed at project stage when more detailed information about the proposed development at this site is available.

#### Air quality and emissions into the atmosphere

- 4.6 The increased intensification of use of the site may result in increased patients and visitors to the site. If the large majority of these trips are made by car, this would have the potential to increase emissions into the atmosphere and as a result have a negative impact on air quality.
- 4.7 To reduce this impact, any further intensification of use and development should be accompanied by measures to encourage the use of, and make improvements to, the local public transport network. ERA considers that strategically, all Local Plan policy reviews required for Rabat should be planned holistically and comprehensively in order to address potential cumulative and synergistic environmental impacts strategically (**see comments above**) and prior to any development commitments are made in principle at policy stage.

#### Surface water runoff treatment

- 4.8 The encouragement of lateral extensions and development on the site is likely to result in the increase of hard surfaces covering the site. This, in turn, may result in increased surface runoff, particularly down the ridge and valley, the natural water run-off channel. This could have negative environmental impacts through soil erosion and contamination of the land and water, therefore any development proposals would need to include appropriate measures to minimise and treat any surface water runoff. Adequate policy safeguards should be included in the new policy.

#### Green open space

- 4.9 The policy GZ-Rbat-11 states that “the open spaces within General Hospital site may be utilised for required development....provided that a balanced and satisfactory open-to-built ration is achieved”. The new policy should make suitable provision to ensure that suitable open green space is provided on site and that this contributes to urban biodiversity in line with the National Biodiversity Strategy and Action Plan (NBSAP).

#### Lack of Green Infrastructure

- 4.10 Generally, there is a lack of consideration of Green Infrastructure (GI) within the new policy. GI will bring a number of benefits such as green space, improved ecosystem quality, development of ecological corridors, energy efficiency, and aesthetic benefits. Moreover, GI is referred to in several strategic policy documents such as SPED, NBSAP and Malta's National Strategy on Climate Change Adaptation.

### **5. Conclusion**

- 5.1 ERA considers that the significant environmental concerns associated with the policy revisions to GZ-SOCF-3 (Health) require further strategic assessment and consideration at policy stage. These revisions are not directly related to Gozo's Hospital Site which is the main subject of this partial review of the Gozo and Comino Local Plan. **Therefore, given that the main environmental issues relating to the Hospital site may be considered further at project**

**stage, ERA recommends that this proposed partial review of the Gozo and Comino Local Plan should specifically focus on the Gozo Hospital site.**