

██████████
Planning Authority
St. Francis Ravelin
Floriana, FRN 1230

20th September 2019

Dear ██████████

**Partial Review of the North West Local Plan (2006), Burmarrad Commercial Area (May 2019)
Consultation in terms of Regulation 4(6) of S.L. 549.61 (Strategic Environmental Assessment Regulations)
Update of ERA's SEA response dated 18th September 2019.**

ERA acknowledges receipt of Policy Map 45A which was inadvertently not included in the original submission with the Planning Authority's SEA screening consultation. Policy Map 45A should form part of the final approved partial review of the Local Plan for this area. Policy Map 45A is included in Annex 1 for ease of reference.

The proposed partial review of the Local Plan for the Burmarrad Commercial Area has been reviewed in the light of the Planning Authority's recent submission (Policy Map 45A). ERA considers that, strategically, the proposed revision to the North West Local Plan 2006 is unlikely to have a significant environmental impact. Depending on the scale, nature and operation of the specific projects, future proposals within the site may also require further environmental assessment, including an Environmental Impact Assessment (EIA) screening procedure in terms of S.L. 549.46 (EIA Regulations, 2007), and possibly environmental authorisation from ERA.

ERA welcomes the PA's statement that all future development and ancillary interventions at this site will be contained within the AOC boundary, as indicated in Policy Map 45A (see Annex I), including junction improvements, service roads, access, car parking, etc., without resulting in the take-up of further undeveloped rural land. Furthermore, it is noted that the PA agrees with ERA that the important features at this site, mainly the watercourse of Wied Qannotta and the existing mature trees at the junction between Triq Qannotta and Triq Burmarrad, should be conserved.

The partial review of the 2006 Local Plan is proposing a 3-metre pedestrian footpath, which shall run along the whole length of the rear side within the AoC boundary. ERA considers that this measure is important in order to allow for a transition to the rural area. ERA also notes that the proposal envisages a 3m setback for the top two floors of the properties facing the rural areas; this is also agreed with in relation to mitigation of short-range visual impact, whilst

also noting that additional design measures (e.g. finishing of rear elevations facing the rural area) may be appropriate to effectively mitigate the visual profile as perceived from longer-range viewpoints.

ERA also welcomes positively the reinstatement back to agricultural land of the current storage yard on the opposite end of the street of the specific site.

These considerations are important to ensure that the foreseen environmental impacts resulting from future development at this site are reduced and mitigated as much as possible.

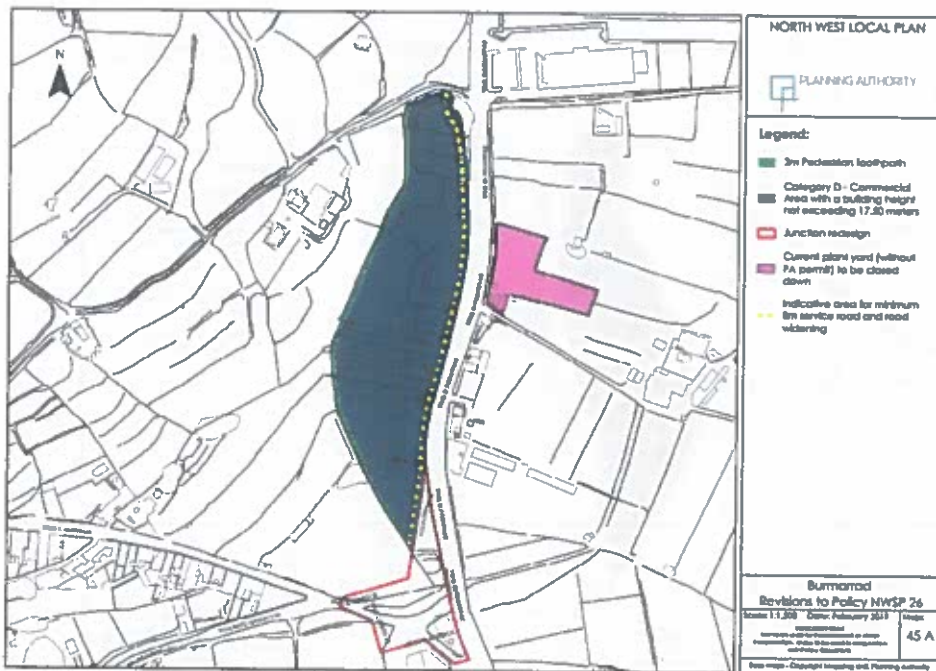
Yours sincerely,



Perit Michelle Piccinino
Director Environment & Resources
Environment and Resources Authority

Annex 1

Policy Map 45A



ERA's SEA response dated 18th September 2019

Partial Review of the North West Local Plan (2006), Burmarrad Commercial Area (May 2019)

Consultation in terms of Regulation 4(6) of S.L. 549.61 (Strategic Environmental Assessment Regulations)

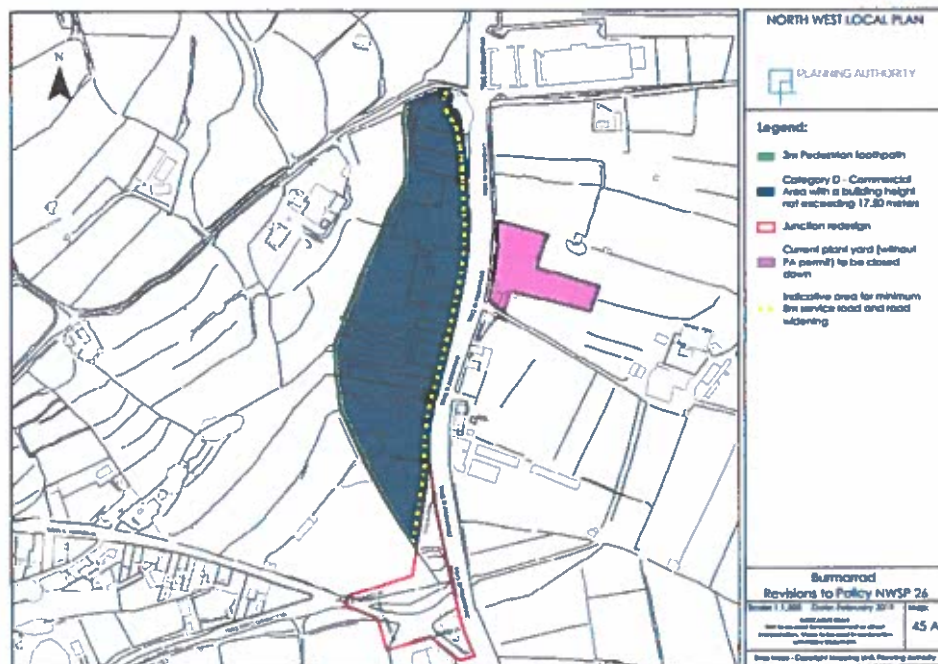
Reference is made to the Planning Authority's (PA) consultation on the Partial Review of the North West Local Plan, Burmarrad Commercial Area (May 2019).

Strategically, the proposed revision to the North West Local Plan 2006 is not likely to have a significant environmental impact, as long as: (i) all future development and ancillary facilities (e.g. road infrastructure) are strictly confined within the existing boundary of the Burmarrad AoC; (ii) natural sites/features are protected; and (iii) suitable measures are adopted for addressing other environmental considerations at project stage.

ERA welcomes the PA's statement that development will be contained within the AoC boundary of the Burmarrad Commercial Area. However, it is noted that the previously circulated Map 45A 'Burmarrad Revisions to Policy NWSP 26' (see Figure 1) was not included in the recent submissions with the PA's SEA screening consultation. This Map clearly showed that the proposed service road and road widening would run parallel to the alignment of Triq Burmarrad, within the existing boundary of the AoC. The proposals shown on such Map are in line with ERA's previous comments on the draft policy, dated April 2019, which highlighted that future development at this site, including junction improvements, service roads, access, car parking, etc., should not result in the take-up of undeveloped rural land and should be contained within the AOC boundary. The Maps submitted with the SEA consultation do not

clearly show that all development and ancillary interventions, including the proposed service road and road widening, will be confined within the existing boundary of the AoC.

Figure 1



Furthermore, it is noted that the PA agrees with ERA that the important features at this site, mainly the watercourse of Wied Qannotta and the existing mature trees at the junction between Triq Qannotta and Triq Burmarrad, should be conserved. ERA also welcomes positively the reinstatement back to agricultural land of the current storage yard on the opposite end of the street of the specific site, as well as the provision for soft landscaping of proposed developments at this whole site and the proposed green belt, in order to reduce adverse impacts. The proposed 3m setback for the top two floors of the properties facing the rural areas is also welcomed, in order to minimize visual impacts resulting from the proposed increase in the height limitation of the buildings at this site.

The above considerations are important to ensure that the foreseen environmental impacts resulting from future development at this site are reduced and mitigated as much as possible. Depending on the scale, nature and operation of the specific projects, proposals within the site may also require further environmental assessment, including an Environmental Impact Assessment (EIA) screening procedure in terms of S.L. 549.46 (EIA Regulations, 2007), and possibly environmental authorisation from ERA.