

PA/00977/17: Comments received by ERA during the Scoping stage (From 22nd May 2017 to 11th June 2017)

A. Ministry for Environment, Sustainable Development and Climate Change – Agricultural Directorate (Email dated 22nd May 2017)

Comments

With reference to your mail below, the Agricultural Directorate is pointing out that should there be any movement of soil, it is very important that the necessary permits are in place as per Chapter 236 of the Laws of Malta.

B. Malta Resources Authority (Email dated 22nd May 2017)

Comments

The MRA has no additional information that it wishes to see included in the Terms of Reference (TORs) for the EIS to PA00977/17 (EA 00011/17) - Upgrading of the Primary Water Network in so far as the functions under its immediate remit.

However, if the proposed development includes excavation works that reach partially or totally within the saturated zone, then the developer should submit an application in writing to the MRA including the details specified in regulation 5(1) of the Borehole drilling and excavation works within the saturated zone regulations (SL423.32).

This assessment is based primarily on the documentation that was published on the weblink provided as on the date of the assessment. The Authority made its assessment on a good faith basis and reserves the right to review its position and, or to take action against the authors of the documentation and, or the applicant if information relevant to its assessment (particularly the prior use of the site where the development is proposed) is 'buried' or concealed (including through the submission of documentation that is not text searchable).

This, and any other response in writing by the MRA to the application submitted for consultation or to any other documentation, should not in any way be deemed as approving or endorsing the application in any form or of condoning any matter that falls beyond the MRA's immediate remit as established under the Malta Resources Authority Act and as in force on the date of the relevant response. In particular, you are reminded that with the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of Groundwater against Pollution and Deterioration Regulations have been excluded from the remit of Malta Resources Authority and as such the MRA has no authority to take a position on matters regulated by these regulations or indeed any other matter that does not fall within its remit. While this response may be published, any response by the MRA may not be publicly used or mentioned as a general or partial approval by the MRA of the matter referred to for consultation.

C. Civil Protection Department (Email dated 26th May 2017)

Comments

With reference to the Primary Water Network and the telephone communication yesterday, The Civil Protection Department recommend the request for Fire Hydrants to be installed with the system.

D. Occupational Health and Safety Authority (Email dated 29th May 2017)

Comments

I appreciate that the PDS does not delve into the health and safety aspect of the project but after attending the meeting earlier today I would like to point out that even if the WSC are going to engage contractors to carry out the various works, WSC still has certain legal obligations with respect to OHS legislation. Thus it is strongly recommended that WSC consult with OHSA in the initial stages to ensure that it is in conformity with all relevant OHS regulations.

E. Pembroke Local Council (Email dated 02nd June 2017)

Comments

On behalf of my client, Pembroke Local Council (address: Triq Alamein, Pembroke, PBK 1776), I am hereby submitting the following comments regarding the above development application:

This is considered to be of national interest and of minor impact on the Pembroke Locality. This due to fact that most works shall be carried out underground using microtunnelling techniques. The gradient has been designed to allow flow by gravity from Attard directly to Pembroke. The pumping system from Pembroke to Ta' Qali will be carried out through 1200mm internal diameter pipes. The fact that most excavation works will be carried out from within the tunnel limited construction traffic and equipment is expected to flow through the locality.

Construction Stage

- 1) It may be prudent that noise and vibration monitoring equipment is set-up especially in the vicinity of existing residential development. If noise and vibration levels exceeded the permissible thresholds, the contractor should be obliged to propose suitable mitigation measures.
- 2) Dust mitigation measures especially within quarry at Entry Tunnel 2 should be closely monitored to minimise disturbance to the public.
- 3) As a green measure, it is being recommended that the material excavated during tunnelling is re-utilised such as aggregate for concrete mix.
- 4) Generators close to ventilation shaft 5B, should be carefully sited so that it does not disturb the residents close-by, including those living close to the car park.
- 5) The council is concerned with the siting of the ventilation shaft 7, located within Pembroke Park and Ride car park. We suggest this shaft is shifted to a vacant natural area next to the car park.

Post-Construction Stage

- 6) Since the Pembroke is remotely located in the outskirts of the locality no adverse effects are being envisaged. However should generators be utilised for WSC, these should be specified as silent generators to limit disturbance to the public.

Notwithstanding, my client would like to be notified on any submissions related to this application and on the date of the sitting of the board so that he may make his oral representations if required.

F. Environmental Health Directorate (Email dated 08th June 2017)

Comments

With reference to your e-mail dated 21 May 2017 regarding subject indicated in caption and following review of the Project Description Statement, please be informed that we would like to have the following issues related to public health included in the terms of reference for this proposed development:

- Adverse noise, vibration and air quality impacts during the construction phase and the effects of these impacts on sensitive receptors in the Area of Influence and on the general public.
- Waste management and disposal issues for all generated waste streams during the construction phase.
- Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel and lubricants.
- Traffic management and related problems including access arrangements and safety measures both for pedestrians and vehicular traffic.
- The overall cumulative impacts of the development on all sensitive receptors in the Area of Influence and the general public.

The EPS should also include a detailed description of the measures envisaged to prevent, minimize and where possible offset any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and on the general public. This should include details of monitoring programmes that may be proposed. The EPS should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.