

**PA/03347/16: Comments received by ERA during the EIA Review stage
(From 10 October 2017 to 10 November 2017)**

A. Civil Protection Department (Email dated 12 October 2017)

Comments

Kindly note that the fire safety report as per reference document 24A submitted by Ing Victor Bonello may need to be updated in accordance with the Planning Authority Fuel Service Stations Policy and the CPD annex. The attached drawings shall clearly show the measures addressed in the same report.

B. Environmental Health Directorate (Email dated 20 October 2017)

Comments

With reference to environmental planning statement dated October 2017 regarding subject indicated in caption, please be informed that this Directorate would like to submit the following comments/recommendations regarding this proposal:

The justification proposed for this development and change of use is to provide a comprehensive service to customers' through the provision of ancillary facilities, including car wash facilities, retail facilities supplying automobile consumables and a tyre service. The scheme is located on Triq il-Belt Valletta, a distributor road. The closest existing fuel service stations to the Scheme site are located at 2.2 km driving distance in iz-Zurrieq, 2.4 km at Malta International Airport and 2.9km in Hal Safi. Hence there is no objection in this regards. However the issues identified by the Local Council of Imqabba and Hal Kirkop with regards to traffic management and security measures in Triq il-Belt Valletta have been noted. Said issues are to be addressed to avoid any potential hazards that may be caused by automobiles to enter the scheme by performing a right hand turn coming from Hal Kirkop.

Should this proposal be accepted, the applicant is to adopt best practice methods together with good site practices and ensure compliance with Environmental Management Construction Site Regulations during the construction phase. Moreover, applicant is to implement all proposed mitigation measures so as to cause least nuisance and mitigate adverse air (from dust dispersal and emissions from vehicles and machinery), noise and vibration impacts on sensitive receptors in the Area of Influence and on the general public (although the nearest residents are approximately 260m away). Hence the importance of drawing up and implementation of a Construction Management Plan to ensure adherence to proper site management practices so as to address groundwater and surface water pollution, to mitigate other adverse construction impacts, including construction traffic impacts and to ensure safety measures. Monitoring of construction works is also highly recommended so as to ensure implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project.

Safe and proper handling of raw materials on site should also be ensured. Adequate preventive measures are to be taken regarding the potential accidental spillage of hazardous fluids, fuel and lubricants which are also to be well managed and adequately stored.

The EHD is particularly concerned with the fact that the scheme falls within a Groundwater Protection Zone but outside the 300m of Groundwater Safeguard Zone and WSC potable water. Also it overlies the Mean Sea Level Aquifer of Malta. Mentioned private boreholes, in addendum to Hydrological report, are not registered with the EHD and hence are not being used for human consumption. As stated in the Hydrological Report the change of use from a concreted platform used as parking and storage, to a site whose operations may give rise to generation of polluted wastewater, said water may find its way to the aquifer. The EHD notes that to minimise the risk of contamination through leakages into the rock below, the site will be sealed with geotextile material and covered with an impermeable layer of concrete to cover all the plant.

With regards to air (benzene and odour) emissions during the operation phase it is pertinent that the proposed vapour recovery systems (Stage IB and Stage II recovery) be installed in line with the

relevant legislation so as to mitigate adverse impacts on sensitive receptors in the area. Moreover, the vapour recovery systems should be maintained regularly to ensure their effectiveness in abating emissions and odours.

Measures mentioned to ensure that surface run-off, water used for dust control, water used for wheel washing and general cleaning and water from the car wash facility are to be adopted and maintained during construction and operational phase.

It is also pertinent that during the operation of the scheme all proposed mitigation measures are strictly implemented so as to mitigate all environmental risks especially through underground, surface and airborne pollution. Therefore, the present risk levels for each source without the implementation of any mitigation measures as mentioned in Volume 2. Page 20, points 43-55 are not acceptable.

Waste management strategy should be adopted and implemented during the excavation/construction and operational phases so that all generated waste streams will be contained, separated and disposed of safely through the appropriate facilities and according to the necessary permits/licences. With regards to removal and disposal of any hazardous waste, adherence to regulatory codes and procedures and due diligence is important in view of the health and safety and any adverse impacts on nearby sensitive receptors.

Generated wastes, cleaning chemicals, etc. from any temporary sanitary facilities for on-site workers should be properly disposed of. Moreover, all water for human consumption and personal use at said facilities is to be adequate, potable and from an approved source (preferably from the Water Utility Supply i.e. Water Services Corporation).

Restrooms- Every restroom present on the premises should be supplied with a wash hand basin and adequate source of ventilation and light. The wash hand basin should be supplied with potable water. The wash hand basin must be connected to a waste water pipe that discharge on a gully trap situated in open area and connected with regular drains.

Reservoir-harvested rain water and recycled water from car wash system should not be used for human consumption and/or personal hygiene.

It is recommended that light dispersion be controlled so as to avoid undesirable pollution effects on the neighbouring environment are recommended.

It is recommended that construction traffic follows established specific routes and adequate site management together with other measures such as storing or transporting creed sand and other loose building materials in containers with suitable covers which effectively prevent dispersal of dusts, washing of wheels and other dust control measures are taken to mitigate adverse dust impacts and nuisances from heavy vehicles during transportation. All other mitigation measures which may be necessary to minimise nuisances and adverse health impacts from construction traffic are to be implemented.

All proposed mitigation measures regarding adverse impacts arising from this development during the construction and operation phase are to be implemented by applicant to mitigate any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and the general public. The possible health effects of any residual impacts that cannot be mitigated and the overall cumulative impacts should also be taken into consideration. Land use requirements during construction such as take up of major road (Triq il-Belt Valletta) leading to traffic build up and road safety issues in such a busy road should be included in the Environment Planning Statement.

As part of the Safety Systems in Section 3 of the main report, it is highly recommended that a Legionella risk assessment plan is adopted for the car wash area. This is due the fact that aerosols from the car wash can be a source of Legionnaires Diseases, as per LN 5 of 2006. Thus further information on the management of water sources to be used for the car wash has to be provided. A detailed plan as to how said water is to be treated and disinfected as to avoid the spread of Legionella bacteria through aerosols is to be provided.

Moreover, any other unpredicted impacts and nuisances which may arise from this development and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken.

Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.

A pollution incident control plan should also be in place. Records of all pollution incidents, especially regarding potential pollution of the surrounding environment, are also to be kept and reported to the respective authorities accordingly.

Regarding any future plans for Scheme decommissioning, a full decommissioning plan should be prepared for approval by the relevant competent authorities.
Risk of workers repeatedly exposed to benzene over long periods of time should be referred to OHSA.

C. Mqabba Local Council (Email dated 10 November 2017)

Comments

The Mqabba Local Council's concerns is all about the eye sore with respect to the mature pine trees that need to be uprooted to make way from this arterial road, the responsibility of which is in the remit of Transport Malta, for the development to materialise. The official website link for the minutes of the said Mqabba Local Council Meeting confirming the above is being referred for your perusal:

http://www.mqabba.lc.gov.mt/mediacenter/PDFs/1_MIN%2083%2005-09-17_.pdf

Excerpt from the referred Mqabba local Council Meeting minutes:

(point 83.11)

Dwar l-EIA tal-petrol station, is-Sindku qalet illi hija u s-SE kellhom laqgħa ma' rappreżentanti ta' ADI Associates propju fi Triq Valletta. Kien deċiż illi l-KLM jikkontesta l-eye sore bil-proposta li se jinjalghu is-siġar eżistenti.

Comments received by ERA during public consultation on the EIA Report (From 24 January 2018 to 24 February 2018)

A. BirdLife Malta (Email dated 23 February 2018)

Comments

Comments on PA 03347/16 "Proposed construction of petrol station and auto repair and maintenance centre instead of an existing open storage yard"
23 February 2018

As a reaction on the EIA Report of the proposed development PA 03347/16 "Proposed construction of petrol station and auto repair and maintenance centre instead of an existing open storage yard" in Mqabba, BirdLife Malta would like to submit the following comments:

- No alternative site has been considered. This contradicts with the Environmental Impact Assessment Regulations (S.L.549.46), 2017, that states in paragraph 13. "Wherever relevant, projects that fall within the scope of these regulations shall require a sufficiently detailed and reasonably exhaustive initial appraisal of potentially suitable alternatives, on the basis of their technical merits, feasibility, and environmental implications and impacts, in the interest of streamlining and optimizing the subsequent assessment process."

- The EIA report highlights that 11 Aleppo Pine trees will be permanently removed. Since the proposed development is located within ODZ, removing these trees is in breach of the Trees and Woodlands Protection Regulations, 2011, stating in Schedule II that Aleppo Pine trees are protected within ODZ. Consequences of removing the trees include among others loss of biodiversity in the Maltese islands. The EIA report does not propose mitigation measures.

Furthermore to the above comments, BirdLife Malta questions the justification for this proposed development since there are at least three petrol and service station located in close distance, one about 1.5 km and two in a distance of about 2 km (see map). Although aware that this is not in breach of national policy, the development is not justified in BirdLife Malta's opinion.

B. Comments by members of the public (Emails dated 25 January 2018 – 29 January 2018)

No	Comments
1.	<p>What is the proportion of petrol stations to the number of cars and has an economic analysis been carried out? Has the financial services sector been sleeping or was it away on vacation?</p> <p>https://www.mercatusenergy.com/blog/bid/86598/the-fundamentals-of-oil-gas-hedging-swaps https://oilprice.com/Latest-Energy-News/World-News/Saudi-Arabia-May-Link-Aramco-Revenue-Royalty-To-Oil-Prices.html interesting how the royal manipulate prices this is like history repeat itself (see Wikipedia.org).</p> <p>What are the environmental concerns that need to be addressed by the investor, before s/he writes a disclaimer saying this is the responsibility of the local council?</p> <p>Also what is the state of play of biofuels are there any providers on the market? What proposals are being prepared and which of them will be actioned? Do the board members get all the merit? (as usual)</p>
2.	<p>With regards to</p> <p>PA 03347/16 - Proposed construction of petrol station and auto repair and maintenance centre instead of an existing open storage yard at Mqabba</p> <p>We certainly do not need more refuelling stations in Malta. We already have the highest concentration of petrol stations in the world and this is not needed or wanted by anybody on this island, except for the ones who stand to profit from these mega developments uglifying our island.</p> <p>I would like to see a PA consultation request for a public garden or open space for once, but that's too much to ask.</p>
3.	<p>With regard to the large amount of requests for petrol station, it is important to bear in mind whether there is a similar outlet within say, 2 km of the proposed outlet.</p> <p>Also, clearly it is now the trend to open large outlets which are not just offering fuel, but also other services, whereas again, if there is a similar outlet within say 5km, there would not be another necessary.</p> <p>In some cases, a permit may be granted simply for a much smaller fuel station rather than the larger complexes now in mode.</p> <p>Again, if there are a large number of these stations with large shops, repairs, car washing facilities, not only will they create an eyesore, but there will not be enough business to keep them all functional.</p> <p>Consider that already, there are never queue's /waiting times when re-fuelling, which proves that the stations in place are already adequate and serving the demand, therefore more stations are really not necessary.</p>