

Environmental Impact Assessment

Screening according to Schedule III of S.L. 549.46

PA Reference no.: PA/07491/16

Project Title: A master-plan of the Gozo Hospital Site consisting of Major alterations, including part demolition and reconstruction, and refurbishment of existing Gozo General Hospital (Use class order 2A), to increase number of beds from 270 to 450 inclusive of all ancillary facilities. With reference to drawing (GGH-iAS-A'B-XX-A-1001) - Refurbishment of buildings 10 and 11 and demolition of buildings 12, 13, 14, 15 and 16. With reference to drawings (GGH-iAS-A'B-XX-A-1002)- New construction of buildings 17, 18, 19, 20 and 21. Reference is being made to a table, attached, showing all buildings, building types and areas.

Location: Gozo General Hospital, Triq L-Arcisqof Pietru Pace, Triq Ghajn Qatet, Rabat (Gozo), Gozo.

Screening date: March 2020

I. BACKGROUND

1. Outline of Proposal

1.1. The proposal involves the redevelopment of the Gozo General Hospital (see Figure 1-7), including:

- Construction of a new three-storey, 225-bed hospital building with diagnostic treatment, day care, surgery suites and clinical facilities;
- Construction of a single-storey anatomy centre;
- Renovation and upgrading of the existing general hospital building, whilst retaining the existing building envelope; and
- Construction of a four-storey car park with 420 car parking spaces, which together with 101 parking spaces at grade around the site will provide a total of 521 parking spaces.

1.2. The total gross floor area of the proposal amounts to 29,860 m², including 15,753 m² for acute care, 13,227 m² for outpatients and long-term care, 300 m² for the mortuary and 580 m² for the anatomy centre. Overall, there will be an increase of 151 beds.

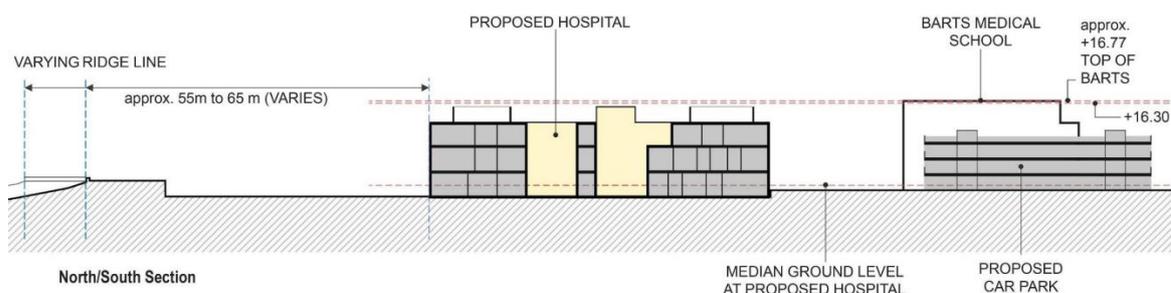


Figure 1: Proposed section (Source: PDS)

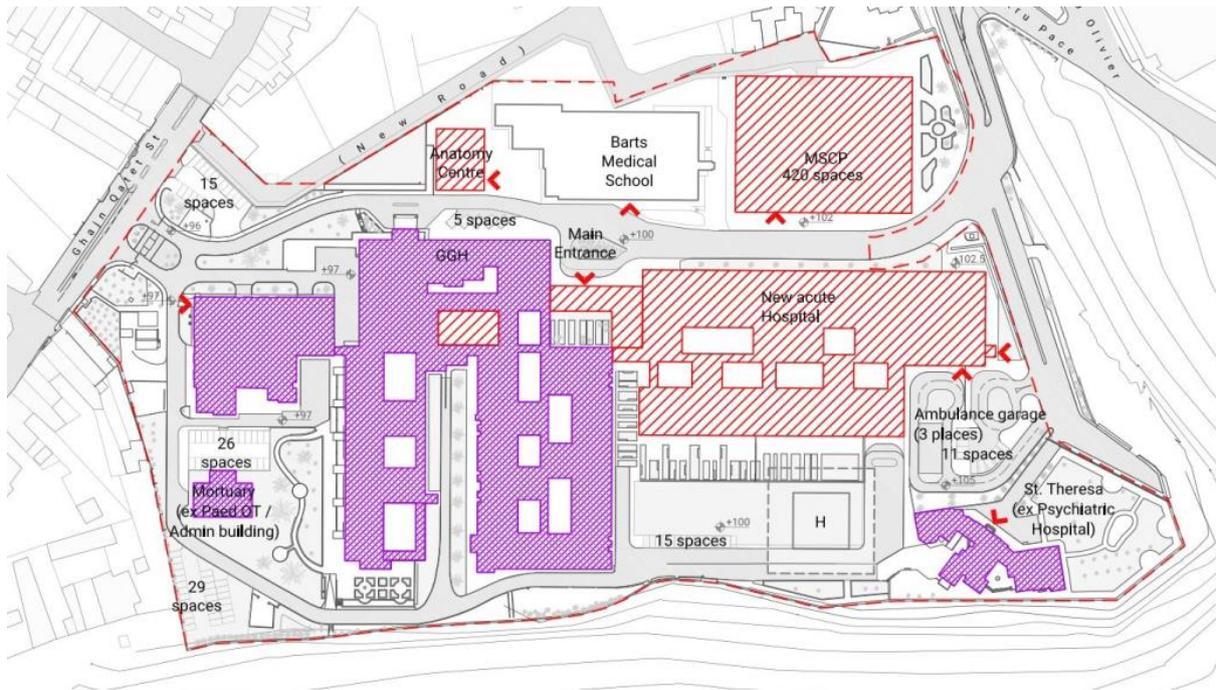


Figure 2: Proposed plan (Source: PDS)



Figure 3: Level 0 plan (Source: PDS)

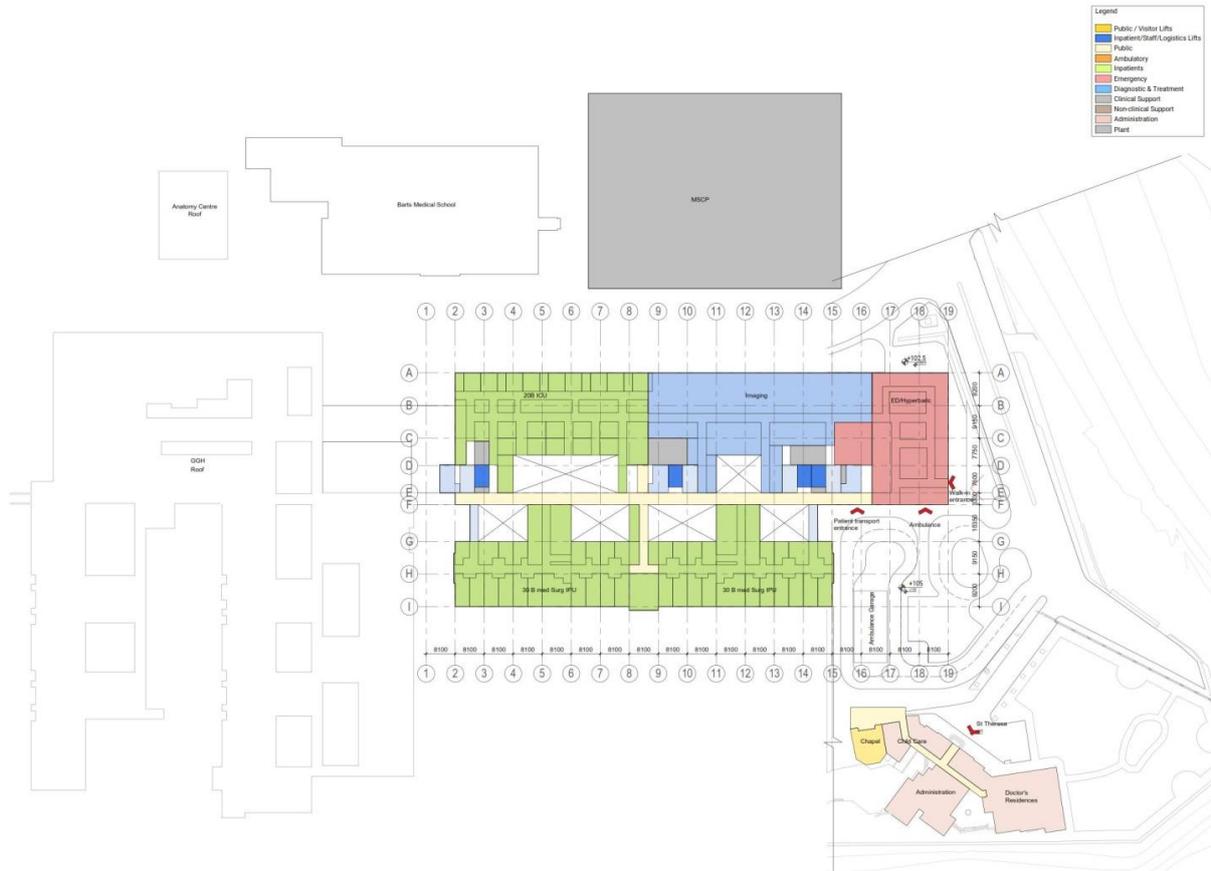


Figure 4: Level +1 plan (Source: PDS)



Figure 5: Level +2 plan (Source: PDS)

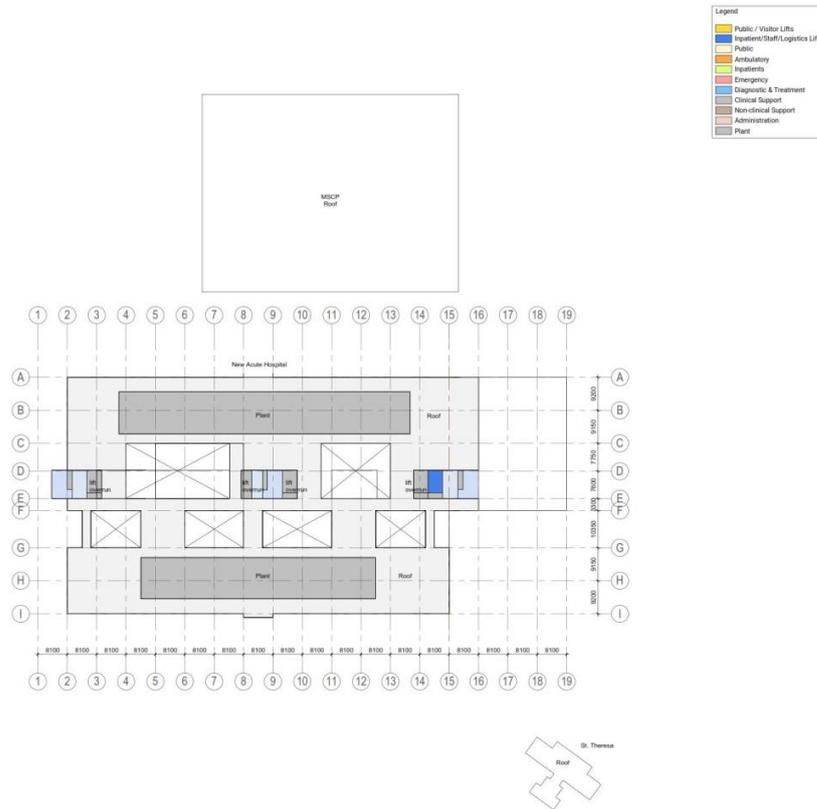


Figure 6: Roof plan (Source: PDS)



Figure 7: Level -1 plan (Source: PDS)

2. Site context

- 2.1. The site covers an area of 72,880 m² and is located on the southeastern edge of Victoria (Rabat), Gozo. Currently, one and two-story buildings are present on site, including the main hospital building, anatomy block, child care centre, and mortuary. Furthermore, the site incorporates the recently constructed and operational Bart's medical school which is located in the western part of the site (see Figure 8).
- 2.2. The areas to the north, west and south of the site contain a mix of land uses, including residential, small-scale commercial and industrial premises. The area to the east/southeast is ODZ and primarily agricultural, including extensive areas of greenhouses.
- 2.3. The site is located on an Upper Coralline Limestone (Tal-Pitkal Member) plateau between 95 and 100 m above sea level. The underlying slope of the plateau is characterised by Greensands and underlying Blue Clay formations. In the vicinity of the site, approx. 200m southwest of the site, a Quaternary doline is present. The site also sits on a perched aquifer (Victoria – Kercem Perched Groundwater Body) and the Gozo Mean Sea Level Aquifer, is within a Drinking Water Protected Area, and located 150 m away from a Groundwater Safeguard Zone.
- 2.4. Due to the proposed landscaping of the entire site, the existing planted areas on site will be replaced by new landscaping (both soft and hard) (see Figure 9-10).

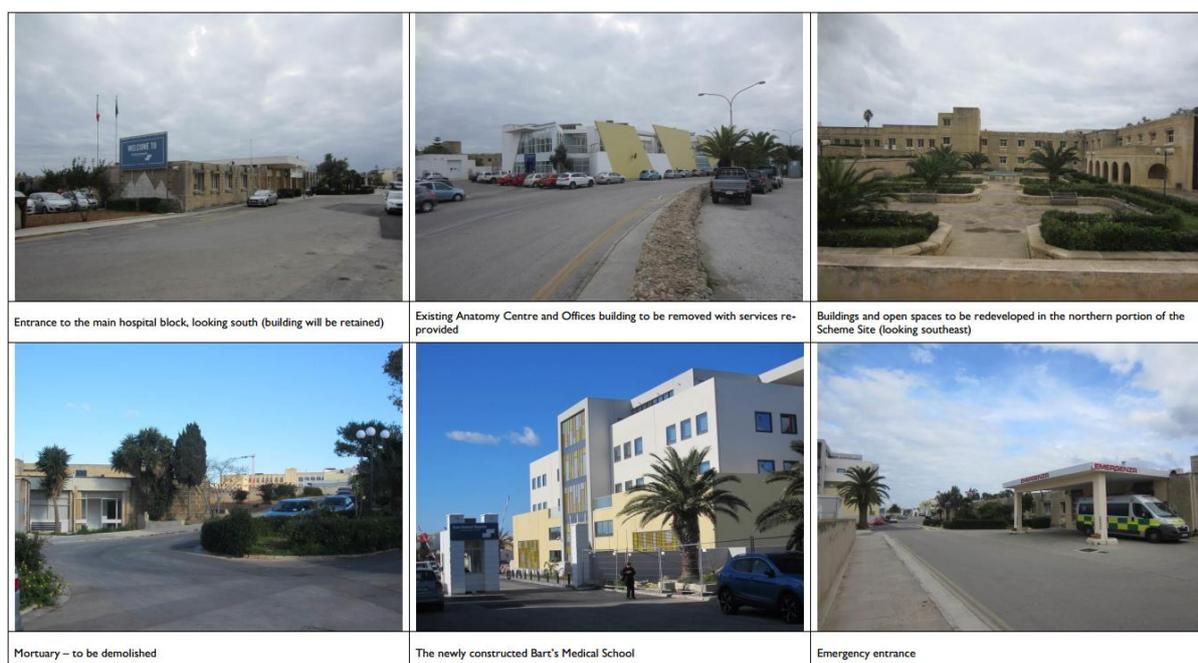


Figure 8: Visual impressions of existing scenario on site (Source: PDS)

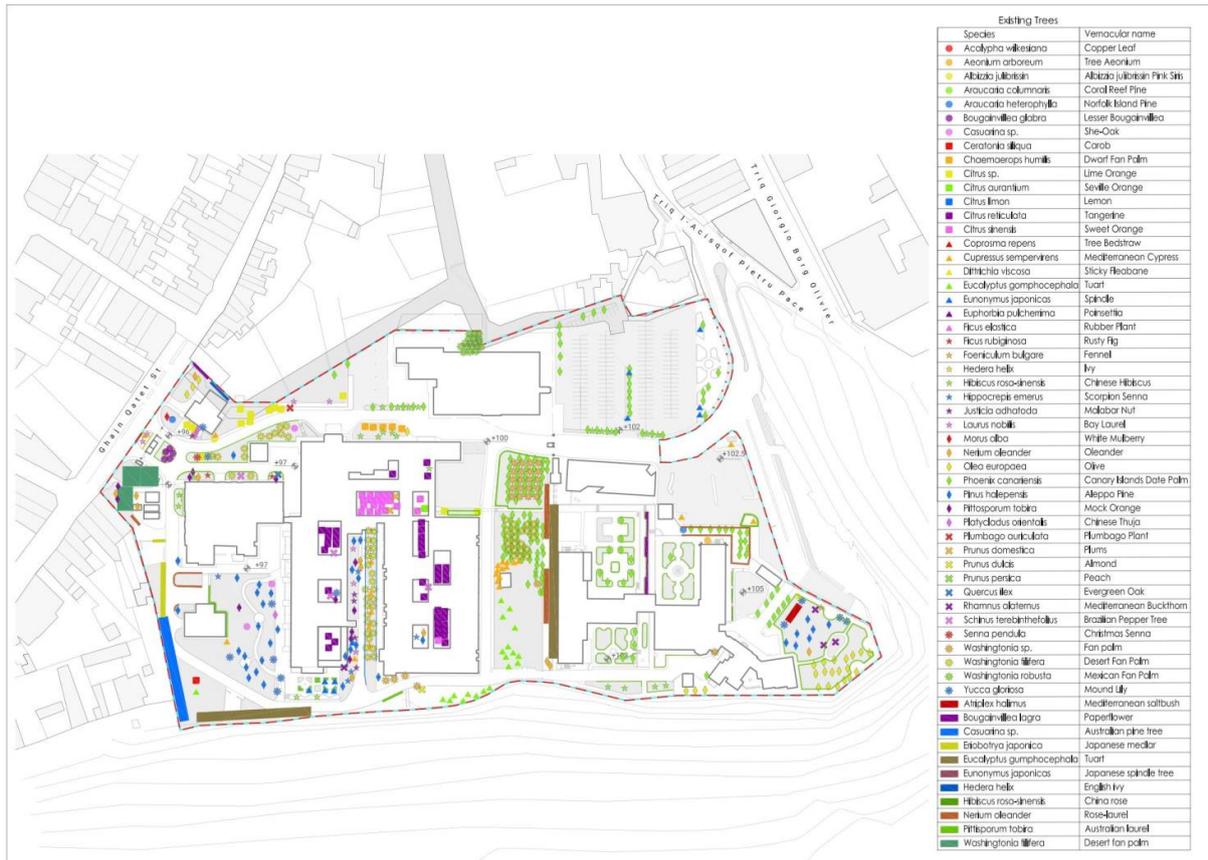


Figure 9: Existing survey on site (Source: PDS)



Figure 10: Trees to be removed (Source: PDS)

3. Case history

- 3.1. Back in 2016, when this project was initially proposed, ERA had assessed the proposal, whereby following screening various potential impacts were unclear and the need for an EIA was communicated to the project proponents, who accepted to carry out such EIA. In fact, before the project was put on hold, the scoping stage had been concluded and EIA terms of reference had been issued.
- 3.2. The revised proposal involves various changes such as the reconfiguration of the new proposed hospital building (massing reduced from four to three storeys, and receded 50m away from the plateau's edge), and now includes more detailed information in terms of envisaged traffic generation and the geological characteristics of the site (which were unclear at the time of the initial screening), and is therefore being re-screened accordingly.
- 3.3. In terms of planning history, the site was previously subject to the following relevant planning applications:
- PA/09895/17 - Demolition of part of existing hospital and erection of proposed stores. Gozo General Hospital, Triq L- Arcisqof Pietru Pace, Triq Ghajn Qatet, Rabat (Gozo), Gozo (Application approved)
 - PA/02357/09 - Proposed child day care centre. Gozo General Hospital, Ta' Librag, Rabat (Gozo) (Application approved)
 - PA/05493/16 - Demolition of existing structures and construction of 3 storey and 1 receded floor of medical school. (Class 2C as per LN74/14). Gozo General Hospital, Triq L- Arcisqof Pietru Pace, Triq Ghajn Qatet, Rabat (Gozo), Gozo. (Application approved)
 - PA/02275/14 - To extend part of existing structure for use as Orthopaedic ward. Gozo General Hospital, Triq Ghajn Qatet, Rabat (Gozo), Gozo. (Application approved)

4. Screening Criteria

4.1 EIA Screening

(citations refer to S.L. 549.46, except where otherwise specified):

The proposed development falls within the scope of the Environmental Impact Assessment Regulations (S.L. 549.46), notably in terms of Category II criteria in Schedule I: Section 7.1.2.1 (i), (ii) and 13.0.2.1. Therefore, the proposal was also screened in terms of the EIA Regulations.

5. Documents used for screening

- a. ERA Screening Report, dated August 2016;
- b. ERA Correspondence at document PA/07491/16 – 28a, dated 19 January 2017;
- c. Project Description Statement (PDS), referred directly to ERA on 14 January 2020;
- d. Further clarifications, referred to ERA on 31 January 2020; and
- e. Revised PDS, referred directly to ERA on 20 February 2020.

II. ASSESSMENT OF PROPOSAL

6. Assessment of Impacts and Ancillary Considerations

(Screening in terms of Schedule III of the EIA Regulations, S.L. 549.46)

Land use

- 6.1. The proposal will be contained entirely within the existing site perimeter of the Gozo Hospital, defined as 'Hospital' grounds in the Gozo and Comino Local Plan 2006 (Rabat Policy Map), and no uptake of additional land is being envisaged by this development.
- 6.2. Whilst the proposal involves the construction of a new 225-bed hospital building, whereby this building will replace the current psychiatric hospital, anatomy building and landscaped gardens, the new building will retain a distance of 50m from the edge of the plateau, and therefore creating open space in between the building and the said edge of the plateau. In this regard, no significant adverse impacts from the proposal on land use on site are envisaged.

Landscape and Visual Amenity

- 6.3. As already indicated above, the site is located on top of a plateau, at a ridge edge overlooking the rural area between the settlements of Rabat, Xewkija and Xaghra which is characterised by traditional terraced fields and topographic/rural features. Due to its elevation, the site (especially the eastern part) is visible from various locations in the wider surrounding area. Currently, the recently constructed Bart's medical school, located in the western part of the site, is the highest and most dominant structure on site. Where the existing main hospital building will be refurbished and thus the existing one-storey building envelope retained, the proposed new building will rise to three storeys. Furthermore, the proposed multi-storey car park, which will be constructed within the footprint of the existing parking area, will rise to four storeys including the roof level.
- 6.4. These new structures are envisaged to intensify the visibility of the hospital site as a whole, however the significance of such remains unclear and should be clarified through detailed photomontages showing the development from different sensitive viewpoints, whilst taking into account and incorporating all proposed mitigation measures, in order for the development to blend into the surrounding area and reduce the visual impact to the greatest extent (specifically noting the Rabat Cittàdella backdrop).

Geology, geomorphology, hydrology and hydrogeology

- 6.5. The proposal involves excavation works to level the sloping terrain in order to construct the new buildings including its foundations. The site geology is characterised by Upper Coralline Limestone, with Greensands and Blue Clay underneath. Due to the presence of this underlying Blue Clay, the proposal was designed in such a way to avoid excavation reaching into the Blue Clay layer, as such may lead to potential impacts on the perched aquifer (Victoria – Kercem Perched Groundwater Body).
- 6.6. Furthermore, due to the geological characteristics of the plateau, the new building was set back 50m away from the edge of the plateau, in order to avoid exacerbation of instability of the plateau's edge and avoid subsidence, which may result from excavation and construction works close to the edge. Nevertheless, ERA notes that any works on a plateau can add to stress and contribute towards instability, which is a consideration that should be duly taken into account by the project proponent during the works to make sure that the geology and geomorphology of the plateau are not affected.

Air Quality

- 6.7. Due to the extensive site area and various works proposed on site, the proposal is envisaged to generate airborne dust emissions. However, such impacts are not expected to be significant given that these will be short term and temporary, and can be sufficiently mitigated through the appropriate environmental measures and provisions of the Environmental Management Construction Site Regulations (S.L. 552.09). Such measures are especially crucial in view that the existing hospital buildings will remain operational throughout the works, and therefore patients and staff on site could be exposed to such emissions, if unmitigated.
- 6.8. During operations, the hospital will generate a significant increase in traffic flows (Annual Average Daily Traffic (AADT) of 1,702 vehicles), and therefore an Air Quality study is required, in line with the Ambient Air Quality Regulations (S.L. 549.59), to ensure that the development will not result in exceedances to the legally binding limit values as specified in the said Regulations.

Noise and Vibrations

- 6.9. With respect to noise and vibrations, the excavation and construction works are not expected to lead to significant impacts, given that these will be temporary and short-term, subject to the proper management and adoption of measures outlined in the abovementioned Regulations (S.L. 552.09).
- 6.10. During operations, based on the current end expected peak hourly traffic flows, the envisaged increase in traffic-generated noise will be below 3 dB(A) and is therefore not considered as a perceivable increase in loudness, especially to nearby sensitive receptors on Triq L-Arcisqof Pietru Pace. Therefore, the expected increase in noise generation due to the increased traffic flows is not considered to be significant.

Waste Management

- 6.11. With respect to waste, it is unclear whether the proposed works intend to disturb the areas identified to contain buried asbestos residue, pipes and the underground foul water system. If these areas are expected to be disturbed, an updated waste management plan is to be provided which shall specify all measures that will be adopted for the management of asbestos, including how the asbestos contaminated construction and demolition waste will be separated from other inert waste. It should be noted that the removal and handling of Asbestos Containing Materials (ACM) is to be carried out in accordance with the requirements of the Prevention and Reduction of Environmental Pollution by Asbestos Regulations (S.L. 549.18).
- 6.12. Furthermore, it is unclear whether any land and groundwater contamination may have resulted from spills or historical contamination (including, but not limited to storage areas for hazardous waste, fuels and chemicals). If this is the case, land investigation may be required according to ERA's requirements.

Others

- 6.13. The current proposal retains the existing access arrangements to the site, whereby the main vehicular and pedestrian access is from Triq l-Arcisqof Pietru Pace, in the northern part of the site. The proposed multi-storey car park will be located near this access point. The second access point at Triq Ghajn Qatet is limited to ambulances only, and it is currently not proposed to open up this access due to logistical reasons.

6.14. ERA is of the opinion that the required Air Quality study should take into consideration all already-existing access points on site, optimising their use so as to deviate traffic away from areas which are already facing pressures in terms of traffic congestion and thus also in terms of air emissions.

Screening Outcome

From the above it has been determined that the proposal may potentially impact the visual amenity and landscape character of the area, due to the construction of the new acute building and multi-storey car park. Furthermore, the proposal may potentially affect the ambient air quality in the area during operations due to the envisaged increase in traffic flows generated by the development.

These findings are in line with the initial screening carried out for this proposal in 2016, however following the reconfiguration of the proposal and the inclusion of additional information in the PDS, it has been concluded that impacts in terms of noise generation, geology, hydrogeology are not expected to be significant, subject to conditions.

Therefore, the above screening concludes that the proposed development requires the submission of:

1. Air Quality study, in accordance with the terms of reference annexed to this correspondence as Annex II; and
2. Photomontages, showing the development from different viewpoints, whilst taking into account and incorporating all proposed mitigation measures in order for the development to blend into the surrounding area and reduce the visual impact to the greatest extent. The viewpoints for these photomontages are to be referred to ERA for its prior approval.

7. Permitting Requirements

In view of the nature of the project, detailed environmental permitting requirements are envisaged (vide Annex III). In this regard, the applicant should contact the Environmental Permitting Unit (industrial.applications@era.org.mt) to discuss these requirements further.

III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD

This proposal was initially assessed in January 2017 (refer to document PA/07491/16 – 28a on the EApps platform), whereby ERA had requested the undertaking of an EIA due to various unclear impacts that may be significant.

However, following the submission of the revised proposal in February 2020, involving various changes such as the reconfiguration of the new proposed hospital building (massing reduced from four to three storeys, and receded 50m away from the plateau's edge), and including more detailed information on envisaged traffic generation and the geological characteristics of the site (which were unclear at the time of the initial screening) the proposal was re-assessed and re-screened.

The above screening has concluded that due to the construction of the new proposed buildings (225-bed hospital building and multi-storey car park), the proposal may still potentially affect the visual amenity of the site (albeit to a lesser extent than previously envisaged), noting its prominent location on top of the plateau and the Rabat Ċittadella backdrop, and therefore the submission of photomontages is required. Furthermore, due to the envisaged increase in traffic flows generated by the development, certain impacts on the ambient air quality in the area during operations may be envisaged, and therefore an Air Quality study is to be undertaken.

ERA considers that the environmental impacts of the revised proposal are unlikely to be significant to the point of warranting an EIA, and that the aforementioned Air Quality study (in accordance with the terms of reference in Annex II) and the submission of photomontages would suffice to further assess the remaining issues. Mitigation measures can then be addressed accordingly, directly through the mainstream development consent procedure.

ERA will be in a position to issue its conditions once the required further studies/submissions have been addressed.

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