

# Environmental Impact Assessment

## Screening

(According to Schedule IB of S.L. 549.46)

**PA file no.:** PA07807/16

**EA file no.:** EA00005/17

**Project Title:** Proposed relocation of kerb-side fuel station and ancillary services (duly licensed) at 6, Valley Road Msida to site in Triq I-Imdina, Attard

**Location:** Site at, Triq L- Imdina, Attard, Malta

**Screening date:** February 2017

### 1. Description of Proposal

#### 1.1 Outline of project/development

PA 07807/16 is a full development application for the construction of a petrol station and ancillary facilities on vacant plot at, Triq I-Imdina, Attard, Malta (Figure 1). The proposal involves the construction of a fuel service station, Autogas filling facilities, a car wash facility, tyre service garage, two charging stations for electric vehicles, an ATM facility, three retail units, an office, underground storage areas and an underground parking space (Figures 2 & 3). The applicant is proposing landscape buffer strips along the whole perimeter of the site and external lights are to be directed away from the road to prevent light spill and glare.

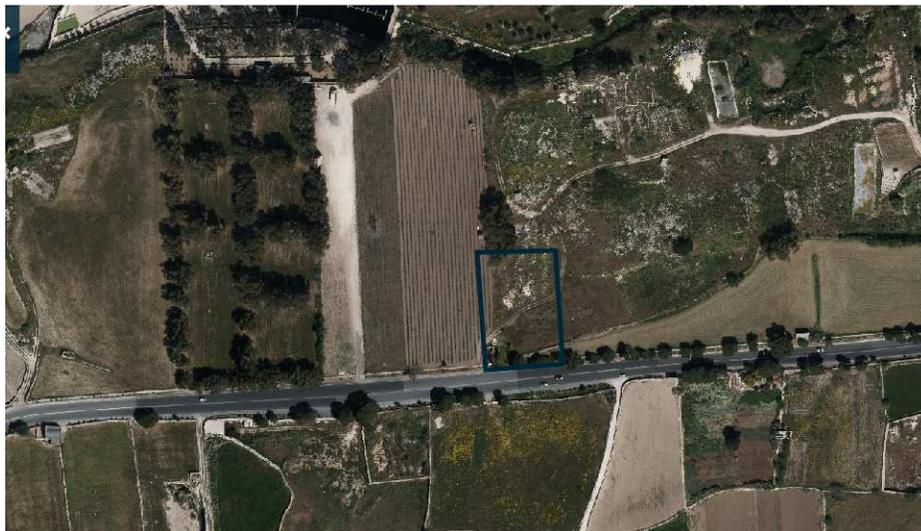


Figure 1: 2016 aerial image of site (outlined)

Figure 6: Scheme Layout

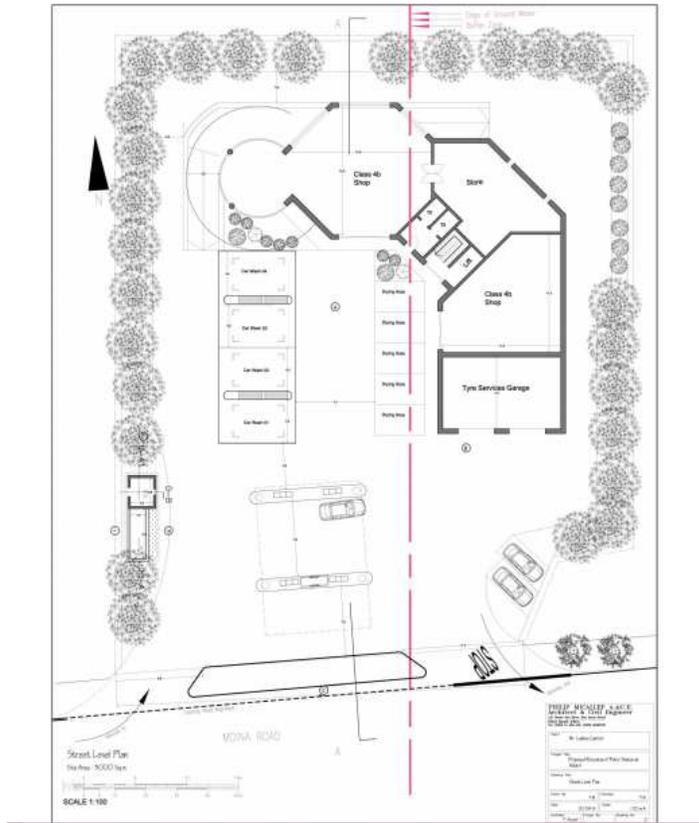


Figure 2: Proposed Layout Plan



Figure 3: Visual impression of the proposed development

## **1.2 Site description and related considerations**

The proposed site has an area of approximately 3,000 sqm and is located on the public road, Triq I-Imdina, which is an arterial road linking the localities of H' Attard and Rabat. The Central Malta Local Plan identifies the site as agricultural land falling within an Agricultural Area whereas the Ta' Qali Action Plan identifies the site as falling within a Strategic Open Gap. The North West Local Plan Policies NWCO 11 and NWTQ of the same Action Plan respectively preclude "*urban development*" in the Strategic Open Space Gap and "*the development of any structure/buildings or activity within the open area between Attard and Ta' Qali.*"

The site is located Outside Development Zone (ODZ), and a small part of it falls within 300m of the Drinking-Water Safeguard Zone as identified by the MRA under the Water Policy Framework Regulations (S.L.549.100). The site is a plot of abandoned agricultural land.

The adjacent land uses are predominantly agricultural, with an exception of the nearest residential area located within the limits of H' Attard Development Zone. This area lies approximately 375 meters east of the site. Mount Carmel Hospital is located approximately 365 meters south east of site. The site is also located approximately 90m from Il-Wied ta' Rmiedi watercourse and 250m from an Area of High Landscape Value (AHLV) designated via Government Notice 1236/12. Along the same road, at a short distance from the site lies an existing petrol station next to Mount Carmel Hospital.

The site also forms part of a larger site which is subject to an outline development application - PA 2153/10 submitted to construct a cemetery. This application is still active and is being processed by the Planning Authority.

## **2. EIA-relevant history**

### **2.1 Relevant EIA/screening criteria** (citations refer to S.L. 549.46, except where otherwise specified):

The proposed development is deemed to qualify for an EPS as per Schedule IA Category II Section 7.6.2.6 (*Construction of a new fuel servicing station*) of the EIA Regulations, 2007 (S.L. 549.46).

It should be noted that during the screening of the application, ERA, (formerly EPD -TRK 162894, EPD Screening Memo) had conveyed its concerns with regards to the proposal since the overall development will commit an ODZ site to urban sprawl and take-up of additional undeveloped agricultural land for urban-type development which can be accommodated in areas already designated for these uses. ERA is also concerned with the introduction of large-scale structures, hard surfacing and other ancillary facility in the area especially in view of the poor justification when considering that the area is already served by another existing fuel station on the opposite side of the same public road. The former EPD determined that there is no valid justification for the further loss of undeveloped rural land and associated environmental impacts, thus, the proposal has been considered objectionable from an environmental point of view.

### **2.2 Version of documents used for screening:**

1. Project Description Statement (PDS) dated November 2016 (PA 07807/16/35a/b/c) referred to ERA on 25<sup>th</sup> January 2017 (PA 07807/16/45a).
2. EPD Memo dated 5<sup>th</sup> August 2015.
3. Plans in Doc. PA/07807/16/28a/b/c/d.

### 3. Screening Matrix

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
1	Will construction, operation or decommissioning of the Project involve actions which will cause physical changes in the locality (topography, landuse, changes in water bodies, etc)?	<p>Yes. Site earmarked for the proposal mainly consists in abandoned agricultural land which houses an agricultural room outside the development zone (ODZ). As stated in the PDS, five mature <i>Pinus halepensis</i> trees will be uprooted to accommodate the proposed development.</p> <p>The proposed development involves the change in land use from abandoned agricultural land into a fuel filling station with ancillary facilities.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>The site will be physically modified since the proposed development will entail the hard surfacing and formalisation of the site and a significant physical change in the landscape and visual amenity of the site and its environs due to change in land-use and the introduction of conspicuous structures.</p> <p>In this regard, EPD correspondence dated 5<sup>th</sup> August 2015 (in PA file) has already indicated that such development on this type of site is objectionable from an environmental point of view.</p>	PDS Pt.1, pg.9
2	Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?	<p>Yes. The proposed development will take approximately 3,000sqm of land outside development zone. The proposal includes the use of raw materials such as masonry (<i>franka</i> stone) blocks, concrete block work/insulated bricks, various grades of concrete, steel reinforcements, structural steel beams and columns during the construction phase.</p> <p>Water and electricity will be used during operation.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>The use of such resources for this individual project <i>per se</i> is not likely to have a significant impact, particularly since the amounts expected to be used are minimal.</p> <p>The energy requirements of the project are also expected to be minimal thus no significant impact is envisaged.</p>	PDS pt.2, pgs.9,10
3	Will the Project involve use, storage, transport, handling or production of substances or materials or energy, especially any resources which could be harmful to human health or the environment or raise concerns about actual or perceived risks to	<p>Yes, the project will entail the transportation, storage and handling of fuel on site, thus leading to the emission of fumes and vapours (VOCs). Furthermore, petrol, diesel and gas (LPG) are classified as hazardous substances.</p> <p>Storage of effluent from ablation facilities could lead to ground water contamination in the surroundings.</p> <p>Storage of all types of waste (including but not limited to tyres) shall be generated</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>It is unclear as to whether the project is likely to have significant effects on the air quality of the area, in terms of additional fumes and/or vapour emissions (including VOCs) generated, and the handling of hazardous substances (such as benzene), possibly being detrimental to the health of the residents of H'Attard and Mount Carmel Hospital patients. In this regard, this is an issue that can be addressed directly through the mainstream development permitting and operational permitting/registration mechanisms.</p>	PDS pt.2 Pgs. 6,8 Para 1-8

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
	human health?	from activities proposed on site.		
4	Will the Project produce solid wastes during construction, operation or decommissioning ?	<p><i>Construction Phase:</i> There may be steel and aluminium off cuts, residue inert building material (like broken concrete blocks), and residue timber, as well as domestic waste generated by the workers. Other wastes will likely include plastic conduit, copper wires covered in plastic, off cuts of steel supporting rods and cable trays, ceramic tiles, paper and plastic bags for materials, aluminium off cuts, broken glass items, and gypsum soffit ceiling parts.</p> <p><i>Operational Phase:</i> The types of wastes that will be produced during the operation of the development will include tyres, and municipal solid waste.</p>	<p>Yes <input type="checkbox"/>    <b>No <input checked="" type="checkbox"/></b>    Unclear <input type="checkbox"/></p> <p>No. The amount of solid waste likely to be generated by the project during the construction is not likely to be significant considering the nature of the project (fuel station). The quantities and nature of the waste can be managed through established waste management procedures and facilities. Furthermore, the management of waste is subject to the provisions of the Waste Regulations 2011, as amended, the Waste Management (Activity Registration) Regulations, 2007 (Legal Notice 106 of 2007). Moreover, soil will be deposited at a site approved by the Department of Agriculture.</p> <p>No significant solid wastes shall be generated during operation.</p>	PDS pt.2 Pgs. 10, 11 Para 24-30
5	Will the project release pollutants or any hazardous, toxic or noxious substances to air?	<p>Yes. Dust will be released during site clearing and excavation.</p> <p>During operation, emissions, including fumes and/or vapour emissions (including VOCs) from fuel are expected.</p> <p>It is further noted that petrol vapours contain benzene which is classified as a carcinogen. A study on the effects of the scheme on the benzene levels would be required in this regard.</p>	<p>Yes <input type="checkbox"/>    No <input type="checkbox"/>    <b>Unclear <input checked="" type="checkbox"/></b></p> <p>Impacts associated with dust generation during the construction phase are not considered to be of major significance, given the amount of excavations (not identified in PDS) required for the proposal, and as long as the construction phase of the project respects the requirements of the Environmental Management Construction Site Regulations, 2007 (Legal Notice 295 of 2007, as amended by Legal Notices 358, 371 and 426 of 2007; Act XV of 2009; and Legal Notice 426 of 2012.).</p>	PDS pt.2 Pg. 13 Para 36-40  PDS pt.2 Pgs 17, 18 Para 49 <i>Impacts on air quality</i>
6	Will the Project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	Yes. Noise and vibrations during both construction (site excavation) and operational (service noise, car parking, filling station activity, traffic movement and commercial facility) stages are expected.	<p>Yes <input type="checkbox"/>    No <input type="checkbox"/>    <b>Unclear <input checked="" type="checkbox"/></b></p> <p>It is unclear whether the noise and vibration impacts will be significant vis-à-vis the existing baseline situation.</p> <p>The project will result in the introduction of new machinery and activity in an area that is not currently characterised by this type of activity, and hence the impact from the net increase in environmental noise in the</p>	PDS pt.2 pg.15

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
			area and on the immediate surrounding uses is considered to be unclear.	
7	Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?	<p>Yes. Part of the development site lies within the Drinking-Water Safeguard Zone as identified by the Malta Resources Authority (MRA) under the Water Policy Framework Regulations (S.L. 540.100).</p> <p>During operation, spills or leaks of hazardous raw materials (petroleum products) and waste could result in potentially significant contamination of the underlying bedrock and underground water table as a result of seepage of contaminated fluids.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> <b>Unclear <input checked="" type="checkbox"/></b></p> <p>Unclear. Whilst noting that the proposal involves a potential high contamination activity, the potential impacts resulting from the proposal are not known. It is to be noted that the site lies within close range of Il-Wied ta' Rmiedi watercourse. Risks of contamination from runoff are unknown at this stage.</p>	PDS pt.2 Pgs. 18,19 Para 49; <i>Impacts on the geo-environment</i>
8	Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	<p>Yes. During the construction phase, there is the risk of dust generation, engine exhaust, accidental spillage of chemicals/oils, vibrations and noise.</p> <p>The operation of the development may present a number of environmental risks, including (i) release of airborne organic compounds such as benzene; (ii) potential leaks, fuel spillage, air emissions, and (iii) risk of fire / explosion due to the storage of highly flammable and explosive substances.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> <b>Unclear <input checked="" type="checkbox"/></b></p> <p>It is unclear whether the project is likely to result in significant impacts vis-à-vis the existing baseline situation. The project will introduce increased risks vis-à-vis fuel leaks, and the emission of benzene and (VOCs).</p> <p>The PDS proposed a number of mitigation measures, including Stage IB and Stage II vapour recovery systems to reduce VOC emissions, a surface water management system to reduce the risk of land and groundwater contamination and spill kits. Additionally, the Scheme is proposing measures to reduce the likelihood and consequences of a fire / explosion, including the installation of ATEX-certified equipment in hazardous zones, a lightning protection system, flame arrestors for vent pipework, and an overhead canopy manufactured using fire-retardant material. An automatic fire detection and alarm system will also be installed, and fire-fighting equipment consisting of dry powder and foam extinguishers will also be available.</p>	PDS pt.2 Pg. 19 Para 49; <i>Environmental risk</i>

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
9	Will the Project result in social changes for example, in demography, traditional lifestyles, employment?	<p>Yes, the project will result in the increased number of people and vehicles stopping in the area to service their cars, and access the commercial service area.</p> <p>On the other hand, no changes in demography are expected.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>The project is not likely to result in significant social changes.</p>	
10	Are there any such factors which should be considered such as the consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?	<p>Yes. The introduction of a fuel station and associated facilities in the area is likely to introduce eventual pressures for further development along this side of Triq L-Imdina which is still relatively uncommitted to development.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>The longer-term implications of the proposal are unclear and potentially significant.</p>	PDS pt.1, comment 9.
11	Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?	<p>Yes. Although the site is not protected <i>per se</i>, it is located in close proximity to Il-Wied ta' Rmiedi which is proposed for future scheduling as an Area of Ecological Importance (AEI).</p> <p>The site is also located approximately 250m from an Area of High Landscape Value (AHLV) designated via Government Notice 1236/12 as part of the scheduling of the Salina Valley System from Djar il-Bniet and Wied Liemu to Wied taċ-Ċawsli, limits of Dingli, Rabat, Mosta, Naxxar and Saint Pauls' Bay.</p> <p>The proposed site falls within the Drinking-Water Safeguard Zone as identified by MRA under the Water Policy Framework Regulations (S.L. 549.100).</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>The impacts envisaged are unclear. The proposed project consists of the take-up of considerable amount of undeveloped land falling outside the committed development zone boundary.</p> <p>With regards to impacts on groundwater, reply to Question 7 refers.</p>	

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12	Are there any areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other water bodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?	Yes. The site lies above the Mean Sea Level Aquifer; the eastern portion of the site is located within the 300 m Groundwater Safeguard Zone. The site is also located approximately 90 m from the Il-Wied ta' Rmiedi watercourse.	<b>Yes <input checked="" type="checkbox"/></b> No <input type="checkbox"/> Unclear <input type="checkbox"/> Refer to comments in question 11 and question 7 above.	PDS pt.2 Pgs 18,19 Para 49; <i>Impacts on the geo-environment</i>  PDS pt.2 Pg 6 Para 1, 2
13	Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?	No. There are no known areas which are used by protected important or sensitive species of fauna or flora.	<b>Yes <input type="checkbox"/></b> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> No significant impacts are envisaged.	
14	Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	See reply to questions 7 and 12 above.	<b>Yes <input checked="" type="checkbox"/></b> No <input type="checkbox"/> Unclear <input type="checkbox"/> See reply to questions 7 and 12 above	PDS pt.2 Pgs 18,19 Para 49; <i>Impacts on the geo-environment</i>  PDS pt.2 Pg 6 Para 1, 2
15	Are there any areas or features of high landscape or scenic value on or around the location which	Yes see reply to question 11.	<b>Yes <input checked="" type="checkbox"/></b> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes. The proposal may have significant impacts on visual amenity and on the overall landscape context given that it shall consist of the take up of a sizeable tract of land falling outside the	PDS, pt.1, pg.18

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
	could be effected by the project?		development zone.	
16	Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?	Yes. The site lies along Triq I-Imdina which is frequently used by commuters on a daily basis and is susceptible to congestion leading to a degradation in air quality.	Yes <input type="checkbox"/> No <input type="checkbox"/> <b>Unclear <input checked="" type="checkbox"/></b> The potential contribution of the fuel station and its associated facilities to traffic load along Triq I-Imdina is unclear.	PDS pt.1, pg.11
17	Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	See reply to question 16.	Yes <input type="checkbox"/> No <input type="checkbox"/> <b>Unclear <input checked="" type="checkbox"/></b> Reply to question 16 refers.	PDS pt.1, pg.11
18	Is the project in a location where it is likely to be highly visible to many people?	Yes, the proposal is located along a main arterial road (Triq I-Imdina). The proposed development is likely to be conspicuously visible from the road.	<b>Yes <input checked="" type="checkbox"/></b> No <input type="checkbox"/> Unclear <input type="checkbox"/> The proposal may have significant impacts on visual amenity and on the overall landscape context given that it shall lead to the take up of a sizeable tract of land falling outside the development zone. Furthermore, notwithstanding the presence of another petrol station not far away from the site, the site in question is located well beyond the nearest development zone, such that it will stand out more conspicuously as an alien feature in an otherwise agricultural landscape.	
19	Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?	No. There are no known areas or features of historic or cultural importance on or around the location.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> No significant impact is envisaged.	

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
20	Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Yes. The proposal consists of the take-up of 3,000sqm of undeveloped Greenfield (ODZ) land.	<b>Yes <input checked="" type="checkbox"/></b> No <input type="checkbox"/> Unclear <input type="checkbox"/> The proposal shall lead to unnecessary and excessive formalisation and uptake of land ODZ that is not considered to be acceptable in a predominantly open and rural area. In this regard, impact is considered to be significant, to the extent of rendering the proposal objectionable from an environmental point of view. This inherent conflict between the development and its siting cannot satisfactorily be addressed through further studies.	PDS, pt.1 pg.11
21	Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?	The proposed site is located 100m from mixed land uses ranging from agricultural land, a vineyard, commercial enterprises, the United States Embassy and a wedding venue. The proposed development is also located approximately 375m away from the nearest residential area and a petrol station and 365m south-east of Mount Carmel Hospital.  The area and its surroundings are also considered to be predominantly agricultural, with the site under assessment being located on an abandoned field.	<b>Yes <input type="checkbox"/></b> No <input type="checkbox"/> <b>Unclear <input checked="" type="checkbox"/></b>  The direct and indirect impacts of the proposed project on both the residential and agricultural areas are considered to be unclear given the nature, scale and location of the project.  The project may also lead to air quality and noise impacts, resulting from the introduction of hazardous substances, as well as due to visual intrusion and the commitment of the currently undeveloped open land nearby for development.	PDS, pt.1 pg.15
22	Are there any plans for future land uses on or around the location which could be affected by the project?	Yes. According to the relevant plans (e.g. Central Malta Local Plan), the site is located outside development zone (ODZ), where a general presumption against such development applies. The commitment of the site to the development would undermine this presumption.	<b>Yes <input checked="" type="checkbox"/></b> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes, the proposal is in direct conflict with the Local Plan's designation and corresponding policies (NWCO 11 & NWTQ 39) for the area thereby prejudicing the effectiveness of such zoning as an environmental safeguard.	PDS, pt. 1 pg.12
23	Are there any areas on or around the location which are densely populated or built up, which could be affected by	Yes. The proposed site is located 375m east of a residential area and is surrounded by predominantly agricultural land, and the site itself is abandoned agricultural land.	<b>Yes <input type="checkbox"/></b> No <input type="checkbox"/> <b>Unclear <input checked="" type="checkbox"/></b> The direct and indirect impacts of the proposed project on both the residential and agricultural areas are considered to be unclear given the nature, scale and location of the project.	PDS, pt.1 pg.15

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	the project?			
24	Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities which could be affected by the project?	Yes. Mount Carmel Hospital is located approximately 365m south east of site.	Yes <input type="checkbox"/> No <input type="checkbox"/> <b>Unclear <input checked="" type="checkbox"/></b> The direct and indirect impacts of the proposed project on Mount Carmel Hospital are considered to be unclear given the nature, scale and location of the project.	
25	Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?	Yes. The site lies above the Mean Sea Level Aquifer; the eastern portion of the site is located within the 300 m Groundwater Safeguard Zone.  The site and its surroundings are agriculture in nature and the proposal will commit a significant portion of undeveloped land.	<b>Yes <input checked="" type="checkbox"/></b> No <input type="checkbox"/> Unclear <input type="checkbox"/> Replies to Questions 1, 7, 15, 20 and 21 refer. This consideration is best addressed directly as a key consideration in the mainstream development control process.	PDS pt.2 Pgs 18,19 Para 49; <i>Impacts on the geo-environment</i>  PDS pt.2 Pg 6 Para 1, 2
26	Are there any areas on or around the location which have already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?	No such areas are known of.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> No significant impacts are envisaged.	Appendix 1.  Pt. 1, page 10.

Question Number:	Questions to be Considered	Identified potential impacts Briefly describe	Is this likely to result in a significant effect? Briefly justify	Document reference
27	Is the project location susceptible to earthquakes, or subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant environmental impacts are envisaged.	PDS, Pt. 1, pg. 10.

#### 4. EIA Screening Conclusion and recommended way forward

##### 4.1 EIA screening conclusion

The above EIA screening matrix indicates that the proposed development would qualify for an EIA as per Schedule 1A Category II Section 7.6.2.6 of the EIA Regulations, 2007 (S.L. 549.46), which would need to address the following aspects:

- Impacts on land use, visual amenity, and the rural landscape;
- Land contamination;
- Impacts on the amenity of the nearby residential areas vis-à-vis the establishment of a hazardous activity in vicinity to a residential area/building;
- Effects of the proposal on air quality and noise, including the effects on human populations and public health;
- Impacts due to the increased traffic flows on Triq l-Imdina;
- Risks to the environment given the storage and retail of hazardous substances; and
- Cumulative impacts on the surrounding area of influence.

It is further noted that, although the above results qualify the proposal for further EIA studies, this requirement is secondary to **ERA's overriding objection** to the development which encroaches beyond the development zone boundary onto a rural area. ERA considers that there is no valid justification for the further loss of undeveloped rural land and associated environmental impacts to accommodate such commercial use. There is also significant concern regarding the cumulative environmental impact cause by the numerous ad hoc proposals for petrol stations currently being proposed on ODZ land. An *ad hoc* EIA for this proposal *per se* would still leave this strategic-level environmental concern unresolved.

In the light of the above, it is confirmed that:

1. The proposed development qualifies for an EIA (EPS);
2. The potential impacts of the proposal are such that the development cannot be exempted from such EIA requirement; and

3. The EIA requirement is without prejudice to the overall objection to the proposal from an environmental point of view as the EIA would not help resolve the main issues affecting the acceptability of the proposal.

#### 4.2 **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.