

# Environmental Impact Assessment

## Schedule III

(Screening according to S.L. 549.46)

**ERA Reference no.:** EA/00006/18

**PA Reference no.:** PA/06835/16

**Project Title:** To demolish existing disused farmhouse and construct Class 3B Hotel including ancillary facilities and a terraced house.

**Location:** Site at, Triq Marsalforn, Xaghra, Gozo.

**Screening date:** February 2018

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## 1. Description of Proposal

### 1.1 Outline of project/development

PA/06835/16 is a full development application, to demolish existing disused farmhouses and construct Class 3B Hotel including ancillary facilities and a terraced house.

The proposed development has a total site area of about 1,812m<sup>2</sup>. The demolition phase includes the demolition of a disused farmhouse, removal of an agricultural room, removal of stretches of rubble walls, site clearance and excavation within the bedrock.

The construction phase shall consist of:

- A three-star hotel with 62 guest rooms and ancillary facilities, with four floors above street level (Level 0 to Level 3) and one floor at basement level (Level -1). (Figures 1 & 2 below refer);
- Two external garden areas with soft landscaping as part of the hotel, one at Level -1 on the Western side of the scheme and the other at Level 0 on the southern side of the scheme;
- Two swimming pool areas at Level -1 as part of the hotel, one of which is located outdoors in the garden, and the other is interconnected between the indoor pool area and external space of the same garden;
- A boundary wall around the two gardens of the hotel;
- Three water reservoirs beneath the basement level (Level -1) of the hotel; and
- A terraced house with four floors above street level (Level 0 to Level 3) and a backyard on the ground floor (Level 0).

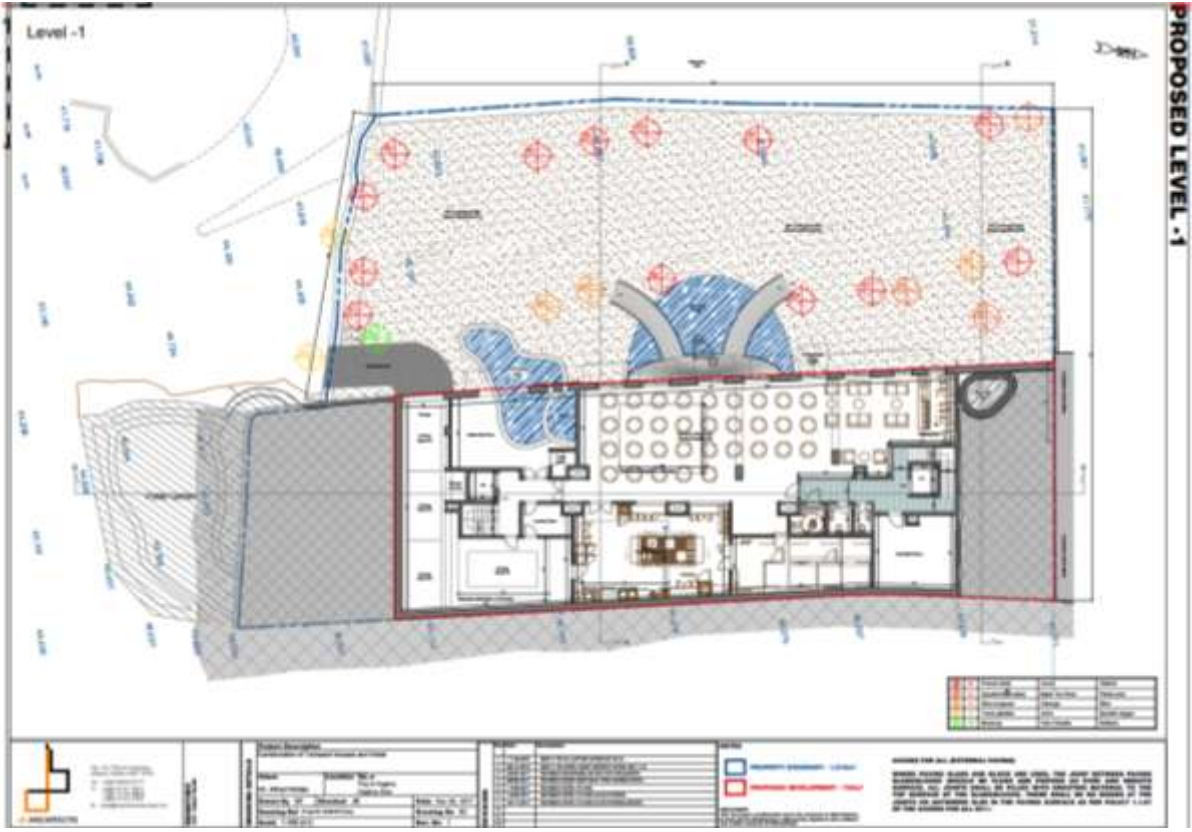


Figure 1. Proposed basement level -1 (Doc.95c).

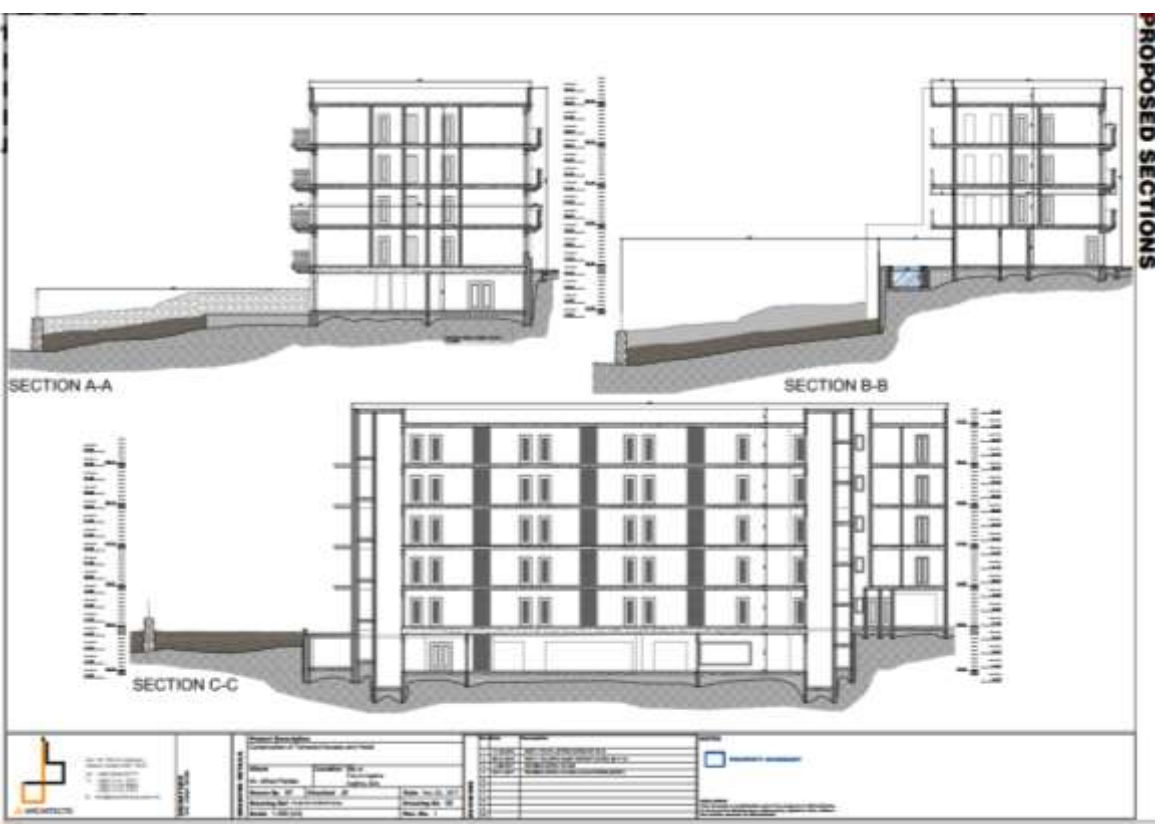


Figure 2. Proposed sections (Doc.95h).

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

The proposal abuts Triq Marsalforn primary road in its Eastern side, which links the village of Xaghra and the seaside resort of Marsalforn. To the North, the site is bordered by a residential building, to the South by a small public garden/belvedere and to the West by used agricultural land. Figure 3 below refers.



*Figure 3. Location of the site earmarked for the proposed hotel. (Source: PDS).*

Much of the surrounding developed area (which takes the form of ribbon development along Triq Marsalforn) is currently dominated by a residential type land use (private residential accommodation and self-catering holiday units). In the surroundings there are also small shop units and tourism infrastructure including other guesthouses and bed and breakfasts. The opposite part of the site is dominated by agricultural land, whilst the land use to the western part of the site is characterised by terraced fields flanking Il-Wied ta' Marsalforn.

According to the Gozo and Comino Local Plan (2006), the site partly lies within a Category 1 rural settlement outside development zone (ODZ) and partly out of scheme. The proposed development site is within an Area of High Landscape Sensitivity (AHLS) and is in the vicinity of the following protected areas:

- Natura 2000 site MT0000001: Ghajn Barrani Area, designated as a Special Area of Conservation as declared through the Flora, Fauna and Natural Habitats Protection Regulations, 2006 (S.L.549.44);
- Area of Ecological Importance and Site of Scientific Importance - Ghajn Barrani u il-Qortin ta' Ghajn Damma (Government Notice 935 of 2006);
- Ghajn Barrani Tree Protection Area (Legal Notice 200 of 2011 and Government Notice 473 of 2011).
- Area of High Landscape Value (AHLV) – Ghajn Barrani (Government Notice 369 of 2008)

### 1.3 Site history

- PA/02466/93: To construct semi-detached bungalows. *Application was refused.*
- PA/00555/07: To demolish existing building and construct basement garages with overlying apartments and penthouses. *Application was withdrawn.*
- PA/02988/10: This application included the demolition of rubble walls, minor internal alterations and extension to existing dwelling at ground floor level and first floor levels, alterations and additions to existing elevations. Dwelling is being split up into six units. *Application was refused.*

## 2. EIA-relevant history

### 2.1 Relevant EIA/screening criteria

Schedule I Category II Section 7.1.2.2 (Construction or extension of hotels, holiday complexes, holiday villages, hostels, homes for the elderly, hospitals, or associated development, if located wholly or partly outside development zones).

### 2.2 Documents used for screening:

1. PDS dated January 2018 at Docs. 97a-c, revised in February 2018.
2. Plans at PA/6835/16/95b-h.

## 3. Screening Matrix Checklist

The following screening checklist is based on information in the Project Description Statement provided by the developer in accordance with Schedule II of the EIA Regulations (S.L. 549.467) and the European Commission Guidance on Screening (2017).

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
1	Will construction, operation, decommissioning or demolition works of the Project involve actions which will cause physical changes in the locality topography, landuse, changes in water bodies, etc)?	<p>Yes. The proposal will lead to physical changes, topography and land use as follows:</p> <ul style="list-style-type: none"> <li>• Hotel footprint extending beyond the boundary edge of the Category 1 rural settlement;</li> <li>• Changes in topography by the excavation of a basement level;</li> <li>• Proposed land use designation as Class 3B not being in accordance to policy.</li> </ul>	<p>Yes <input type="checkbox"/>    <b>No <input checked="" type="checkbox"/></b>    Unclear <input type="checkbox"/></p> <p>The development located within the development zone will not likely to have significant impacts on the integrity of the surrounding locality, including topography and landuse, noting the nature of other similar surrounding land uses, and the existing hotels/tourist accommodation in the area.</p> <p>In terms of the physical changes to the site, part of the proposed hotel (namely the garden and pool areas) lies outside the Category Settlement and therefore the development involves encroachment beyond scheme boundary, leading to urban sprawl. This issue i.e. land up-take out of scheme and urban sprawl can be directly addressed through the development control process.</p>	PDS p.107

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
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?	Yes. The proposal will make use of land and natural resources such as <i>franka</i> stone, cement, steel and electricity. During operation, electricity and water will be consumed. All of the above resources are neither renewable nor in such short supply as to be markedly affected by this project <i>per se</i> .	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No, the use of such resources for this individual project <i>per se</i> is not likely to have a significant impact.	PDS p.90
3	Will the Project involve the use, storage, transport, handling or production of substances or materials which could be harmful to human health to the environment or raise concerns about actual or perceived risks to human health?	Yes. Dust emissions may occur during demolition, excavation and construction, which may have a temporary impact on the nearby residential dwellings and surrounding area.  During operation, the proposal may increase operational traffic.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> Considering that the nature and scale of the proposal is of low density, it is not foreseen that there will be any significant generation of substances or materials which could be harmful to human health or the environment. In this instance, no significant impacts are envisaged.  Dust generated during the construction phase is temporary and could be effectively mitigated through standard mitigation measures enforced in accordance with the Environmental Management Construction Site Regulations (S.L. 552.09). Should any hazardous waste be generated during construction, this is to be disposed at designated hazardous waste landfill sites.  During operation, any hazardous wastes should be placed in appropriate containers and managed in line with the hazardous waste consignment permit regulations. The increase in operational traffic is not considered to be significant in view of the nature and scale of the proposal.	PDS p.96
4	Will the Project produce solid wastes during construction, operation or decommissioning?	Yes, solid waste will be generated during both construction and operation.  The proposal is expected to generate approx. 5000 tonnes of inert waste resulting from excavation, and approx. 21 tonnes of inert waste, approx. 3 tonnes of non-hazardous waste and <1 tonne of hazardous waste from site clearance, demolition and construction.  During the operational phase, expected waste streams include	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> Considering the nature and size of the proposal, the amount of waste likely to be generated during construction, excavation and operation is not considered significant. Waste produced during construction and operations of the development will be managed in accordance with the Waste Management (Activity Registration) Regulations (S.L.549.45) and the Waste Regulations (S.L.549.63.	PDS p.93-95

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
		<30 tonnes of inert waste, <4 tonnes hazardous waste and <25 tonnes non-hazardous waste consisting mostly of municipal solid waste, kitchen waste including waste oil, and sewage from ablution and sanitary facilities.		
5	Will the project release pollutants or any hazardous, toxic or noxious substances to air or lead to exceeding Ambient Air Quality standards in Directives 2008/50/EC and 2004/107/EC?	<p>Yes. During construction, fugitive dust emissions from site clearing and excavation are expected. Construction vehicles may also generate NOx emissions.</p> <p>During operation, there may be the possibility of NOx from operational traffic to and from the site.</p>	<p>Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/></p> <p>No. Dust emissions during the construction phase are not considered to be of major significance given their temporary nature and can be sufficiently mitigated through the proper application of measures identified in the Environmental Management Construction Site Regulations (S.L. 552.09).</p> <p>The proposal is not expected to generate a considerable amount of traffic during both construction and operation. In this regard, impact is not considered significant from an environmental point of view.</p>	PDS p.96
6	Will the Project cause noise and vibration or the releasing of light, heat, energy or electromagnetic radiation?	<p>Yes. Noise and vibration during construction phase from site clearing, excavation and construction are expected.</p> <p>During its operation, the development would possibly result in increased light and noise levels from the increase in operational traffic.</p>	<p>Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/></p> <p>During the construction phase, standard mitigation measures in accordance with the Environmental Management Construction Site Regulations (S.L. 552.09) should be sufficient to minimize temporary noise impacts and vibrations resulting from excavation works.</p> <p>During operation, light emissions are not expected to be significant as long as lighting is reduced to a minimum (especially towards the western part of the site facing the countryside). The increase in operational traffic is not expected to increase significantly the noise levels in the area and the proposed development is not expected to engage in loud noise-emitting activities.</p>	PDS p.111
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. According to the Gozo &amp; Comino Local Plan (2006) Map14.12-E, the site lies within an Aquifer Protection zone – GZ-UTIL-7.</p> <p>In addition, the proposal lies close to Il-Wied ta' Marsalforn, which is designated as a Category B valley by GCLP</p>	<p>Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/></p> <p>The proposed excavations are not anticipated to enter the saturated zone of the perched aquifer and the loss of effective infiltration area for natural aquifer recharge is considered negligible. Nevertheless, necessary measures are still to be adopted to prevent further deterioration and protect the aquifer</p>	PDS Appendix 3

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
		<p>Policy GZ-RLCN-2. The project may pose the risk of contamination of water through the potential release of contaminated waters into the valley bed. During the construction phase, overflows of construction/ excavation debris may result, whilst during the operational phase, runoff from the site into the surrounding lands may result.</p> <p>There are also potential risks of oil leaks and accidental spillages from construction vehicles, although these are expected to be minor.</p>	<p>in compliance with the requirements of the Water Policy Framework Regulations (S.L.549.100).</p> <p>The implementation of appropriate design and operational measures should sufficiently ensure that there is no polluted or sediment-laden runoff into the adjacent areas including il-Wied ta' Marsalforn.</p> <p>Any spillages can be effectively prevented through the application of mitigation measures identified in the Environmental Management Construction Site Regulations (S.L. 552.09).</p>	
8	Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?	No increase in the risk of accidents is envisaged, other than occupational risks typically associated with construction activity.	<p>Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/></p> <p>No significant impacts are envisaged.</p>	
9	Will the Project result in environmentally related social changes for example, in demography, traditional lifestyles, employment?	<p>Yes. The proposal will intensify the use of a land parcel, which is currently occupied by a derelict farmhouse with abandoned fields, and introduce a 3-star agritourism boutique hotel with 62 guest rooms spread over four floors above street level and one floor at basement level, resulting in an increase in the present building height.</p> <p>This will also result in the introduction of further tourists within this area and employment of about 17 full-time workers during operation.</p>	<p>Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/></p> <p>Noting site context and scale of proposed development, no significant changes are envisaged.</p>	PDS p.89
10	Are there any such factors which should be considered such as the consequential development which could lead to environmental impacts or the potential for cumulative impacts with other existing or planned activities in the	<p>Yes. Part of the proposal already seeks to extend beyond the scheme boundary, resulting in urban sprawl beyond the rural settlement. If accommodated, the development is likely to serve as a precedent that opens up future pressures to accommodate similar extensions to the nearby plots, and possibly also over a wider geographic area.</p> <p>There might also be future demands for additional</p>	<p>Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/></p> <p>As the plans for the proposal currently stand, there is the potential for the said development to open up further intensification within the site area of the proposal and/or in the surrounding area.</p> <p>However, this consideration does not merit further detailed assessment through the EIA process, as these can be directly addressed through the development control process, as previously stated in Question 1</p>	

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
	locality?	piecemeal development on site, such as the provision of additional parking spaces, should this application be established and consolidated.	above.	
11	Is the project located within or close to any areas which are protected under international, EU or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the Project?	<p>The proposal extends beyond the boundary of the rural settlement, which is intended to safeguard the surrounding countryside against further urbanisation.</p> <p>In addition, the site also lies approximately 100 metres from the nearest edge of the following protected areas:</p> <ul style="list-style-type: none"> <li>• Natura 2000 site MT0000001: Ghajn Barrani Area, designated as a Special Area of Conservation as declared through the Flora, Fauna and Natural Habitats Protection Regulations, 2006 (S.L.549.44);</li> <li>• Area of Ecological Importance and Site of Scientific Importance - Ghajn Barrani u il-Qortin ta' Ghajn Damma (Government Notice 935 of 2006);</li> <li>• Ghajn Barrani Tree Protection Area (Legal Notice 200 of 2011 and Government Notice 473 of 2011).</li> <li>• Area of High Landscape Value (AHLV) - Ghajn Barrani (Government Notice 369 of 2008)</li> </ul>	<p>Yes <input type="checkbox"/>    <b>No <input checked="" type="checkbox"/></b>    Unclear <input type="checkbox"/></p> <hr/> <p>The site for the proposed development and the protected areas are separated by other buildings in the rural settlement. In this regard, and also noting site context and the nature and scale of the proposal, the protected areas are not expected to be materially affected by the proposed development. No additional significant impacts are envisaged, other than the issues identified in Questions 1 and 10 above.</p>	PDS p.8 & p.80.
12	Are there any areas on or around the location which are important or sensitive for reasons of their ecology e.g. marshlands, wetlands, watercourses or other water bodies, the coastal zone, mountains, forests or woodlands, which could be affected by the Project?	Reply to Question 11 refers.	<p>Yes <input type="checkbox"/>    <b>No <input checked="" type="checkbox"/></b>    Unclear <input type="checkbox"/></p> <hr/> <p>Reply to Question 11 refers.</p>	
13	Are there any		<p>Yes <input type="checkbox"/>    <b>No <input checked="" type="checkbox"/></b>    Unclear <input type="checkbox"/></p>	



Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
	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?	Reply to Question 11 refers.	Reply to Question 11 refers.	
14	Are there any inland, coastal, marine or underground waters (or features of the marine environment on or around the location which could be affected by the Project?	Reply to Question 7 refers.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Reply to Question 7 refers.	
15	Are there any areas or features of high landscape or scenic value on or around the location which could be effected by the Project?	The development lies within an Area of High Landscape Sensitivity (AHLs) as per Gozo and Comino Local Plan (2006) Map 13.1-B.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> The proposed hotel is unlikely to render the hotel excessively obtrusive on the skyline given the height of the existing development in the immediate surroundings; therefore, no significant impacts are envisaged from the proposed development <i>per se</i> .  It is being proposed to enclose the outdoor amenity area at the rear of the site within landscaped banks and a landscaping scheme to reduce any visual impacts of the proposal at the rear.	PDS p.8
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?	The site for the proposed development is directly accessible from the primary road network. Apart from a very small public garden in close proximity to the site, the proposed development will be at an adequate position away from potential sensitive receptors (e.g. churches, schools, hospitals, etc.).  Malta Public Transport operates a bus route, Route 322, which passes through Triq Marsalforn which is also serviced by a bus	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> The road has enough vehicular capacity for the passenger and heavy vehicles during both construction and operational phases and is not considered susceptible to congestion. In addition, the proposed development is easily accessible by public transport.  In view of the above, and considering that the proposal is not expected to generate a considerable amount of traffic during construction and operation, no significant impacts are envisaged from an environmental point of view.	PDS p.21 & p.101

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
		stop named 'Masri' right in front of the proposed development.		
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?	Yes, but these are not expected to be significantly affected by the proposed development. Reply to question 16 above refers.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Reply to Question 16 above refers.	
18	Is the Project in a location where it is likely to be highly visible to many people?	The proposed site is mostly visible from long distances, particularly from areas to the West of the site.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Reply to Question 15 above refers.	PDS p.2
19	Are there any areas or features of historic or cultural importance on or around the location that could be affected by the Project?	The existing farmhouse on site, rubble walls and agricultural room are in a dilapidated state.  There are no sites scheduled for archaeological/ cultural heritage in close proximity to the site.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> The proposed development is unlikely to impact any historic or cultural heritage features and sites surrounding the site, however consultation (directly through the development permitting process) with the Superintendence of Cultural Heritage (SCH) is recommended.	
20	Is the Project located in a previously undeveloped area where there will be loss of greenfield/ODZ land?	Part of the proposed development will result in take-up of agricultural land and disused agricultural land out of the Category Settlement boundary.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Replies to Question 1 and 10 refer.	
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?	Yes. Much of the surrounding developed area (which takes the form of ribbon development along Triq Marsalforn) is currently dominated by a residential type land use (private residential accommodation and self-catering holiday units). In the surroundings there are also small shop units and tourism infrastructure including other guesthouses and bed and breakfasts.  The opposite part of the site is dominated by agricultural land, whilst the land use to the western part of the site is characterised by terraced fields flanking Il-Wied ta' Marsalforn.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> No significant environmental impacts are expected, as the proposed use is generally similar in nature to the other existing developments in the area.  Construction-phase impacts and nuisances can be minimised at source through proper application of the Environmental Management Construction Site Regulations (S.L. 552.09), together with the effective implementation of a comprehensive construction management plan (CMP).	PDS p.59-61

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
22	Are there any plans for future land uses within or around the location which could be affected by the Project?	The proposed development would encroach beyond the Category Settlement boundary, onto land which is designated as ODZ and as an Area of High landscape Sensitivity. Current plans seek to safeguard such land against further urbanisation. Replies to questions 1, 10 and 15 refer.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Replies to questions 1, 10 and 15 refer.	
23	Are there any areas on or around the location which are densely populated or built-up, that could be affected by the project?	Reply to Question 21 refers.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Reply to Question 21 refers.	
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?	Reply to Question 16 refers.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Reply to Question 16 refers.	
25	Are there any areas within 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?	Reply to Question 21 above refers.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> Reply to Question 21 above refers.	
26	Are there any areas within or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded that could be affected	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.	

Question Number:	Questions to be Considered	Types and characteristics of identified potential impacts  Briefly describe	Is this likely to result in a significant effect?  Briefly justify	Document Reference
	by the project?			
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?	The likelihood of such extreme events in the area is considered to be minimal.	Yes <input type="checkbox"/> <b>No <input checked="" type="checkbox"/></b> Unclear <input type="checkbox"/> No significant impacts are envisaged.	

## 4. Conclusion

### 4.1 Screening Conclusion and recommended way forward

The above detailed EIA screening concludes that the main environmental impacts of the development relate to urban sprawl beyond the category settlement boundary as well as likely consequential pressures for further urban sprawl onto the contiguous countryside. The nature of the issues is not one which can be adequately addressed through EIA studies. Rather than requiring further EIA studies, these implications need to be addressed directly through the mainstream development consent mechanism, namely through a down-scaling of the proposed land uptake such that the development is confined to the existing limit to development and avoids encroachment beyond the ridge edge onto the underlying rural land. ERA has already objected to the currently proposed plans, for the afore-mentioned reasons.

In view of the above, the proposal does not merit the submission of an EIA Report in accordance with Regulation 15(3b) of the EIA Regulations 2017 (S.L. 549.46), whilst noting that the development as currently proposed is objectionable from an environmental point of view.

### 4.4 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.