

Environmental Impact Assessment

Screening

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

PA file no.: PA 05732/17

Project Title: Outline Permit - Demolition of existing licensed explosives factory & re-development onto Eco-spa & resort Class 3A. Development includes excavation of site for accommodation of facilities.

Location: Pulvic Explosives Factory, off Triq il-Qaws, Dingli, Il-Qaws, Rabat, Malta

Screening date: February 2018

1. Description of Proposal

1.1 Outline of project/development

PA 05732/17 involves the demolition of the existing Pulvic explosives factory and construction of an Eco-Spa & Resort (Class 3A) with accommodation facilities. The development will consist of 11 units, five of which will be two floors and the rest being single units, with a maximum accommodation capacity of 68 people in 34 double bed rooms.

There will also be a number of ancillary facilities, namely a pool and deck area along with a water feature in the centre, a reception, restaurant, bar/lounge, kitchen, offices, gym, and spa at the centre. The underground levels will consist primarily of parking (64 spaces) and storage areas. The proposed interventions will cover an area of approx. 6,000m², with the gross floor area taking approx. 9,000m².

1.2 Site description and related considerations

Currently, the site is mostly disturbed through asphalt and concrete flooring, and includes of a number of one-room buildings. There is also a large water reservoir at the centre of the site surrounded by an abandoned agricultural field.

The site is currently served by two country roads, one which is found along the edge of the cliff, whereas the other leads from the centre of Dingli village. It is located over gently sloping ground overlooking the area of Mtaħleb and Dingli cliffs. The surrounding areas are dominated by garrigue habitat, interspersed with a number of agricultural areas.

The proposal is located:

1. within a Special Area of Conservation (SAC) & Special Protected Area (SPA): *Rdumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sa Il-Ponta ta' Benghisa* (MT0000024);
2. within an SAC of International Importance: *Rdumijiet ta' Malta* (G.N. 223/05);
3. within an Area of Ecological Importance (AEI – Level 3) (G.N. 400/96);
4. within an Area of High Landscape Value (G.N. 400/96); and
5. adjacent to a SAC and SPA: *Rdumijiet ta' Malta: Ras il-Pellegrin sa ix-Xaqqa* (MT0000032).



Figure 1. Location of the site (Source: PA Geoserver)

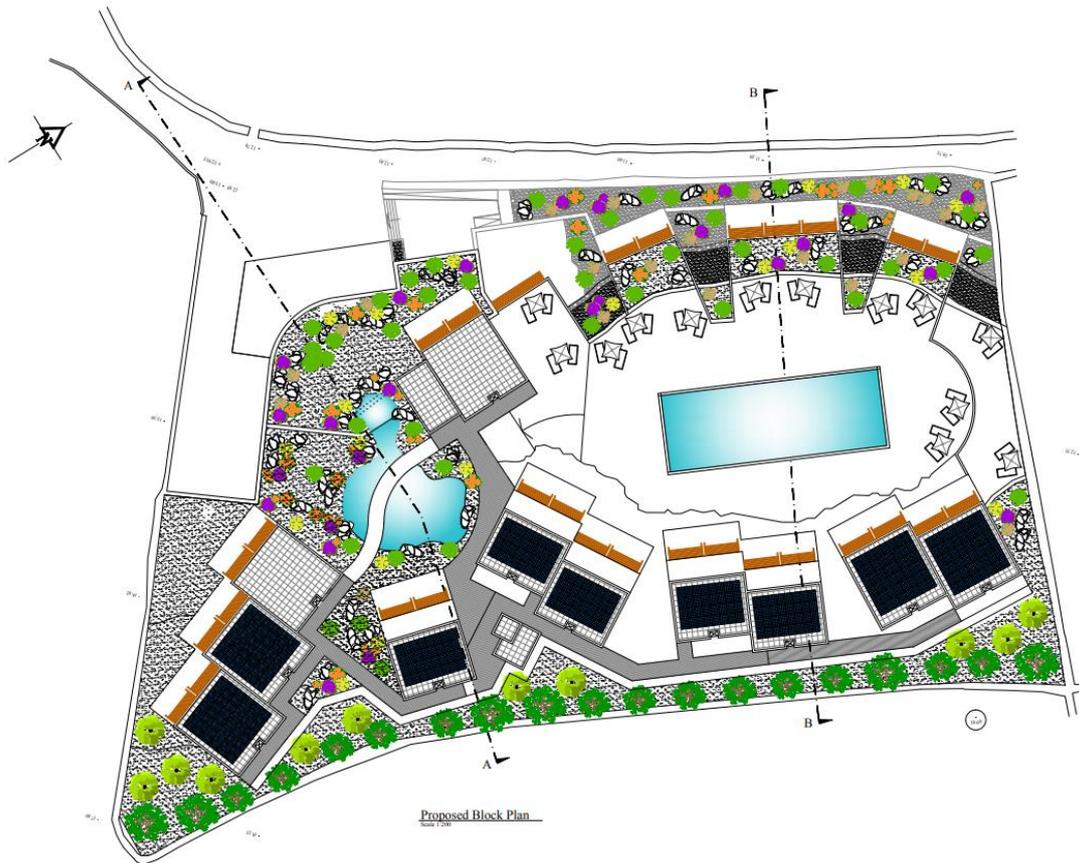


Figure 2. Block Plan (Source: Doc. PA/05732/17/1m)

2. EIA-relevant history

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

At ERA screening stage (PA 05732/17/Doc. 101a), the proposed development was deemed to qualify for an EIA under Schedule IA, Category II, Section 3.3.1.1 (ii) (*Construction or extension of hotels, holiday complexes, holiday villages, hostels, accommodation facilities, homes for the elderly, hospitals, or associated development, if located wholly or partly outside development zones and having: (ii) a gross floor area of 10,000m² or more; or a site area of 2.5 ha or more*) of the EIA Regulations, 2007 (S.L. 549.46), and thus the submission of a Project Description Statement (PDS) was required.

Following the publication of the revised EIA Regulations, 2017 (S.L. 549.46) and communication with the applicant, the project was re-screened and was considered as falling within the scope of Schedule III, Category II Section 7.1.2.2 (*Construction or extension of hotels, holiday complexes, holiday villages, hostels, accommodation facilities, homes for the elderly, hospitals, or associated development, if located wholly or partly outside development zones, and not covered by Category I*) of the same regulations.

2.2 Appropriate Assessment Screening

As was noted at ERA screening stage (PA 05732/17/Doc. 101a), and in communication with the applicant the proposed development was deemed to qualify for an AA in accordance with the Flora, Fauna and Natural Habitats Protection Regulations of 2006 (S.L. 549.44) due to its siting within a Natura 2000 site (*Rdumijiet ta' Malta: Ir-Ramla tac-Cirkezza sal-Ponta ta' Benghisa* MT0000024 SCI) and in close proximity to another Natura 2000 site - *Rdumijiet ta' Malta: Ras il-Pellegrin sax-Xaqqa* (MT0000032 SPA).

2.3 Version of documents used for screening:

1. PDS dated 15th December 2017; and
2. Plans and Drawings (PA/05732/17/Doc. 1a-1n).

2.4 Version of documents used for screening:

- **PB 01118/87:** Permit issued on 11/03/1987 for the construction of an explosives factory.
- **PA 04672/97:** Re-use of existing explosives factory to educational agriculture and residential use. The appeal against the decision of this application has been dismissed.
- **PA 03299/94:** To erect store in existing factory. Application was refused.
- **PA 03486/09:** To replace existing explosives factory with fireworks factory depot. Application was refused.

3. Screening Matrix

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	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.</p> <p>The project involves the demolition of the existing Pulvic fireworks factory and construction of an Eco-Spa & Resort (Class 3A) with accommodation facilities.</p> <p>The proposed interventions will cover an area of approx. 6,000m², with the gross floor area taking approx. 9,000m².</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>The site per se is already disturbed and presently committed for use by the Pulvic fireworks factory. However, excavations will take place on most of the site leading to a change in the site topography. Furthermore, the proposal will introduce a change in land-use and potentially drive further intensification of use of the area, with consequent indirect implications on the site surroundings.</p>	PDS Pg. 21
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.</p> <p>The proposal will take up approximately 6,000m² of land.</p> <p>The proposal also includes the use of various materials, masonry, concrete, metals, and plastics, during construction, and water and electricity during operations.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>The use of resources during both construction and operation for this individual project <i>per se</i> is not likely to have a significant impact given the nature of the proposal.</p>	PDS Pg. 47
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 human health?	<p>Yes.</p> <p>Dust emissions may occur during demolition, excavations and construction phases, which may have a temporary impact on the surrounding environment, together with other emissions that would be generated by machinery during construction.</p> <p>During operation, the proposal will result in an increase in operational traffic, which may have an impact on air emissions.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Potential dust impacts are not typically considered to be of major significance, given the amounts of excavations required, as well as their short-term and temporary nature. However, due to the proposal's proximity to multiple sensitive areas, dust impacts may result in a significant impact on the surrounding ecology.</p> <p>During operation, the proposal may potentially lead to an increase in air emission impacts generated by traffic in and around the area, however given that the total number of beds catered for will be 68, the proposal is not likely to have a significant impact on air quality during operation.</p>	PDS Pg. 49

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
4	Will the Project produce solid wastes during construction, operation or decommissioning ?	<p>Yes.</p> <p>Solid waste will be generated during both construction and operation. Waste arising during construction will consist of demolition (1,125m³), excavation (25,500m³) and general construction waste.</p> <p>During operation, the proposal will generate municipal solid waste.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>No significant impacts are envisaged. The amount of solid wastes generated during construction and operation are not expected to be significant given the extent of the development. All construction waste will be collected for disposal in approved inert waste landfills.</p> <p>Given the size and scale of the proposal, the amount of waste generated during operations is not expected to be significant.</p>	PDS Pg. 44
5	Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Reply to Question 3 refers.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Reply to Question 3 refers.</p>	PDS Pg. 49
6	Will the Project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	<p>Yes.</p> <p>The proposal will generate noise, vibrations, and light emissions during both construction and operation. These may affect the SAC- <i>Rdumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sal-Ponta ta' Benghisa MT0000024</i> and SPA.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/> <p>Light and noise pollution during both construction and operation are likely to cause disturbance to biodiversity in the area noting that currently this is a rather dark and quiet area at night.</p>	PDS Pgs. 50-52
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.</p> <p>The site lies about 400m from the closest coastal zone (<i>L-Irdumijiet ta' Malta</i> coastal water body).</p> <p>During the construction phase, spillages of oils and lubes, as well as overflows of construction/excavation debris, may result.</p> <p>During the operational phase, run-off from the site onto the surrounding lands may occur.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <hr/> <p>Due to the proposal's proximity to multiple sensitive areas, as well as the nearby coastal zone, runoff from construction site and/or operational-phase surfaced areas may result in a significant impact on the surrounding lands.</p>	PDS Pgs. 50-52
8	Will there be any risk of accidents	No increase in the risk of accidents is envisaged, other	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <hr/>	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
	during construction or operation of the Project which could affect human health or the environment?	than 'normal' occupational risks typically associated with proposed development.	No significant impacts are envisaged during both construction and operation.	
9	Will the Project result in social changes for example, in demography, traditional lifestyles, employment?	No. Considering the scale, nature and size of the project, the proposed development is not expected to lead to significant demographic or social changes. The project will employ an equivalent of 40 full-time workers and will provide approximately 68 beds for on-site accommodation during operation.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant changes are expected.	PDS Pgs. 45
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?	Yes. The development is likely to introduce consequential requirements for ancillary infrastructure (e.g. access, parking, utility services, sewerage, etc). Furthermore, the establishment of such use may also open up the surrounding remote rural area to other development pressures.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> Yes. As per previous column.	/
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?	Yes. The proposal is located: 1. within a Special Area of Conservation (SAC): <i>Rdumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sa Il-Ponta ta' Benghisa</i> (MT0000024); 2. within an SAC of International Importance: <i>Rdumijiet ta' Malta</i> (G.N. 223/05); 3. within a scheduled Area of Ecological Importance (Govt Notice 400/96); 4. within a scheduled Area of High Landscape Value (G.N. 400/96); and 5. adjacent to a Special Area of Conservation (SAC): <i>Rdumijiet ta' Malta: Ras il-</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> The impacts of the development on the protected sites are likely to be significant when considering the project seeks to introduce a commercial development within a particularly sensitive natural area. This is of additional concern when considering the potential consequential developments referred to in Question 10. Due to these potential impacts, and the proposals vicinity to two Natura 2000 sites, an Appropriate Assessment (AA) has also been requested in accordance with the Flora, Fauna and Natural Habitats	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
		<i>Pellegrin sa ix-Xaqqa</i> (MT0000032).	Protection Regulations of 2006 (S.L. 549.44). From an environmental point of view, the development is considered as being in direct conflict with the effective conservation of the surrounding rural area, and this is already reflected in the ERA's objection to the proposal.	
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 project lies within an SAC (MT0000024), as well as lying adjacent to another SAC (MT0000032). Both are rich in Annex I habitats, as declared through the provisions of the Flora, Fauna and Natural Habitats Regulations of 2006 (S.L. 549.44).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> As per response to Q11.	/
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?	Yes. The terrestrial SPA <i>Rdumijiet ta' Malta: Mir-Ramla ta' Ghajn Tuffieha sax-Xaqqa</i> (MT 0000032) is protected for Monticola solitaries. This SAC, as well as <i>Rdumijiet ta' Malta: Ir-Ramla tac-Cirkewwa sa Il-Ponta ta' Benghisa</i> (MT0000024), are also rich in Annex II species and host some of the best populations of some of these species.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> As per response to Q11.	/
14	Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Yes. The site over the perched aquifer which is used only for agricultural purposes. During the construction phase, spillages of oils and lubes, as well as overflows of	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Due to the proposal's overlying of the perched aquifer, runoff from construction and/or operations may result in a significant impact.	PDS pg. 51

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
		<p>construction/excavation debris, may occur.</p> <p>During the operational phase, run-off from the site into the surrounding fields may occur.</p>		
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?	<p>Yes.</p> <p>The site also lies within a protected Area of High Landscape Value (scheduled via Govt Notice 400/96).</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>From an environmental point of view, the development is considered as being in direct conflict with the effective conservation of the surrounding rural area, and this is already reflected in the ERA's objection to the proposal.</p>	/
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?	<p>No.</p> <p>The site is far from most population centres but is also frequented by many visitors for recreational activities due to its scenic value.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/></p> <p>Due to the area's popularity as a recreational site, the proposal may lead significant impacts on the surrounding infrastructure.</p>	/
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?	<p>No.</p> <p>The site is far from most population centres and lies on a remote country road, which is not used regularly.</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No significant impacts are envisaged.</p>	/
18	Is the project in a location where it is likely to be highly visible to many people?	Replies to Questions 15 & 16 refer.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/></p> <p>Replies to Question 15 & 16 refer.</p>	/
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.	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No significant impacts are envisaged.</p>	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
20	Is the project located in a previously undeveloped area where there will be loss of greenfield land?	Not directly. Most of the site is dominated by the existing Pulvic fireworks factory. However, indirect pressures are likely (e.g. pressures for future expansion, consequential development as indicated in response to Q10, etc)	Yes <input type="checkbox"/> No <input type="checkbox"/> Unclear <input checked="" type="checkbox"/> Direct impact is not expected on this front, but indirect impacts are highly likely.	/
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?	No such land uses are present on site.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged.	/
22	Are there any plans for future land uses on or around the location which could be affected by the project?	Yes. The entire area is located ODZ, and is an important rural conservation area. It is also specifically protected on multiple environmental grounds, as explained in response to Q11. Current plans award precedence to conservation, among others through a general presumption against development pressures.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> From an environmental point of view, the development is considered as being in direct conflict with the effective conservation of the surrounding rural area, and this is already reflected in the ERA's objection to the proposal.	/
23	Are there any areas on or around the location which are densely populated or built up, which could be affected by the project?	No such land uses are present. The closest inhabitants to the Scheme live in a farmhouse around 150m due East. There are other rural residences between the site and the periphery of <i>Dingli</i> village which lies around 1.1 km South-East of the site.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged.	/
24	Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals,	No such land uses are present.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged.	/

	Issues to be considered	Relevant constraints, environmental considerations & potential impacts	Is any significant effect envisaged?	Document reference
	schools, places of worship, community facilities which could be affected by 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, as already indicated in the above responses.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unclear <input type="checkbox"/> <hr/> As per above responses (Q11, etc)	/
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.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> <hr/> No significant impacts envisaged.	/
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. No such events are envisaged, albeit the site is located in a very exposed location where strong winds may be an issue.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> <hr/> No significant impacts are envisaged.	/

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 I Category II Section 7.1.2.2 of the EIA Regulations, 2017 (S.L. 549.46), which would need to address the following aspects:

- Effects of the proposal on land use;
- Effects of noise on the surrounding areas;
- Potential impacts from runoff;
- Impacts on ecology (flora and avifauna);
- Cumulative impacts on the surrounding area of influence; and
- Impacts on the visual amenity of the site.

The above is without prejudice to the concerns raised in ERA's Doc. PA05732/17/101a in view that the proposed development is incompatible with the overarching priority to effectively conserve the natural, ecological and scientific importance of this area, including its protected species, and overall natural state and high landscape sensitivity of the area. It is also in direct conflict with the scheduled status of the area, and with the consequent presumptions against development arising from such scheduled status. In view of the above, the proposal is objectionable from an environmental point of view. Rural conservation should be the overriding priority/objective for this sensitive area and its environs.

4.2 AA screening conclusion

AA requirement is confirmed, as per above indications.

4.3 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.