

Environmental Impact Assessment

Schedule III

(Screening according to S.L. 549.46)

ERA Reference no.: EA/00058/18

PA Reference no.: PA/07965/17

Project Title: To sanction structures as built including a surrounding open space in beaten earth to propose a sheep farm with ancillary milk and cheese let production, manure clamp, stores, changing rooms, toilets, temporary structures, including the demolition of existing aviary, the addition of two cesspits and additional openings for better cross ventilation in animal units.

Location: Ta' Joq, Tal-Għaqba, Siggiewi, Malta

Screening date: October 2018

1. Description of Proposal

1.1 Outline of project/development

PA 07965/17 seeks to sanction three existing structures of varying uses forming part of a farm complex which are not covered by a valid permit. The majority of the structures are used for the harvesting of olive, orange and carob trees for the personal use of the applicant and this use will remain unchanged. A smaller portion of the site includes buildings which allow for the milking of 4 female domestic sheep and production of cheeselets (*gbejniet*). The proposal seeks to increase the capacity of the farm to about 30 female sheep in order to commercialise the production of the cheeselets. The proposal will also construct two cesspits and minor internal alterations to improve the sanitary facilities on site and be in line with the Dairy Farms Regulations (S.L. 449.03).

1.2 Site description and related considerations

The geographical location of the site is in Tal-Għaqba, within the administrative boundary of the Siggiewi Local Council. The site is located in a valley, Wied Qirda, which mainly comprises of agricultural land and vegetated areas. The site itself is covered in maquis with some agricultural land towards the south; it is partially designated as an agricultural area by the South Malta Local Plan and falls within a valley protection zone designated by the same Local Plan. It has a total site area of approximately 165m², including a cesspit still to be constructed of 8m³. Site is enclosed by a boundary wall and also lies partially within;

- An Area of Ecological Importance (AEI) and Site of Scientific Importance (SSI) according to the South Malta Local Plan (SMCO 03);
- The Tree Protection Area (TPA) of Wied Qirda (l/o Siggiewi) (G.N. 473/11); and
- The Special Area of Conservation (SAC) of National Importance at Ta' Bloq (l-Inhawi) / Wied Qirda (G.N. 223/05).

2. EIA-relevant history

2.1 **Relevant EIA/screening criteria:** (citations refer to EIA Regulations, 2017 (S.L 549.46), except where otherwise specified):

The proposed development was screened on the basis of Schedule I, Category II, Section 12.4.2.3 (*Manufacture of dairy products*) of the Environmental Impact Assessment Regulations (S.L. 549.46).

2.2 **Documents used for screening:**

1. ERA Memo dated 31st October 2017 (PA/07965/17/Doc.53a).
2. ERA Memo dated 23rd May 2018 (PA/07965/17/Doc.102a).
3. Project Description Statement (PDS), referred to ERA on the 2nd October 2018 (PA/07965/17/Doc.116a).



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

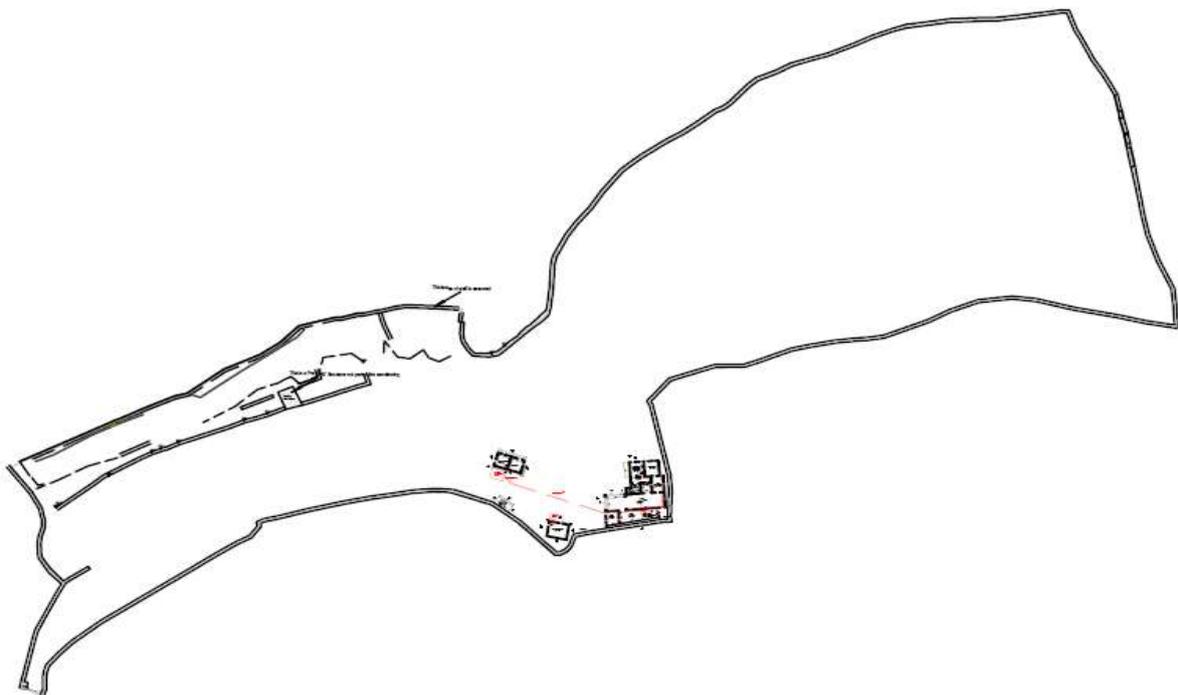


Figure 2. Existing Block Plan (Source: PA/07965/17/Doc.96c)

EIA Screening

- 3.1.** This proposal involves the sanctioning of about 165 m² of built structures indicated as having different uses and extensive areas of hard surfaced areas. Such interventions may have impacts through the disturbance of water flows and percolation within the valley, but the significance of such impacts is unclear. Although a PDS was requested due to the production of cheeselets, the primary issue of concern with this proposal is the introduction of extensive development within an ODZ area. These interventions are considered excessive and unjustified especially within the site context, that is, a sensitive and protected area.
- 3.2.** Other minor impacts are also possible. For example, waste during construction will be minimal (about 20m³ of rock during excavation), while operations are expected to produce about 200kg of cardboard per year. However, any such impacts are likely to be negligible, as well as confined to the applicant's site, since only a small portion of the site will comprise cheeselet production.

4. Conclusion

4.1 Screening Conclusion and recommended way forward

This proposal is a flagrant example of the lack of environmental considerations, such that illegal commitments and excessive land uptake has taken place at the expense of rural areas; in this respect, ERA's comments dated 31st October 2017 (Doc. PA/07954/17/53a) are being reiterated. These impacts cannot be adequately addressed through EIA studies, but rather need to be addressed directly through the mainstream development consent mechanism.

This situation is of significant concern to the ERA, and should not be rewarded through retroactive sanctioning. In addition, approval of this proposal would consolidate further development intensification and sprawl ODZ.

In view of the above, ERA continues to consider the proposal as being objectionable from an environmental point of view.

Without prejudice to the above, should the proposal be considered favourably by the Planning Authority against ERA's position, the applicant is to be informed that;

- The proposal qualifies for a Nature Permit in view of proposed interventions in a TPA, and thus would need to contact ERA's Environmental Permitting Unit (nature.permitting@era.org.mt) to discuss the requirements; and
- Additional environmental-related conditions may be imposed.

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.