



PA 05783/19

REDEVELOPMENT AND CHANGE OF USE OF A PERMITTED BUILDING TO PROVIDE FOR AGRITOURISM ACCOMMODATION (CLASS 3A), AT FURPLAY RABBIT FARM, ALLEY NO. 2, TRIQ HAL FAR, ZURRIEQ

PROJECT DESCRIPTION STATEMENT

Version 1: October 2019



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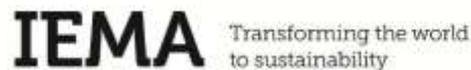
Redevelopment and Change of Use of a Permitted Building to provide for Agri-tourism Accommodation (Class 3A) Project Description Statement October 2019

Report for: **Malta Agri Produce and Events**

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INTRODUCTION

1. This Project Description Statement describes a proposal to redevelop and change the use of a permitted building to provide for agri-tourism accommodation (Class 3A), at Furplay Rabbit Farm, Alley No. 2, Triq Ħal Far, Zurrieq (see **Figure 1**). The development will comprise a total of 10 guestrooms, together with ancillary facilities, including an outdoor swimming pool. As described below, the 'permitted building' refers to a building granted under PA 02251/09 in connection with a manure clamp.
2. The project is proposed by Alfred Schembri, Carmel Schembri, Reuben Schembri, Joseph Schembri, and Catherine Schembri, who are hereinafter referred to as 'the Applicant'; the project is hereinafter referred to as 'the Scheme'.

BACKGROUND

3. The Applicant has been operating a rabbit farm from the Scheme site since 1996, where permission was granted "*To construct rabbit farm*" under PA 02014/95 and PA 02591/96 and later amended to include a slaughterhouse in 1999, under PA 01548/98.
4. In August 2011, a Full Development Permit was granted for "*Extension to rabbit farm (approved in PA 01548/98 and PA 02591/96) to provide manure clamp in line with EU Regulations and sanctioning of changes to approved layout*" (under PA 02251/09). This permit was renewed in August 2016 (under PA 03041/16). As mentioned, the Scheme is proposed as a redevelopment and change of use of the manure clamp. The drawings of the manure clamp (plans, elevations and sections), as well as a description of the works that have been carried out on the site to date, are included below.
5. In February 2017, a Full Development Permit was granted for "*Alterations and additions at first floor Level to an existing rabbit farm, to include an area for promoting and tasting of local agricultural produce, including cooking on site and change of use of previously approved area from office to common entrance area and from toilets to preparation area*" (under PA 02505/16).
6. In July 2019, the Applicant submitted a Full Development Permit application for "*Redevelopment & change of use of an existing permitted building approved in PA 02251/09 into an agri-tourism accommodation Class 3A and ancillary facilities*" (under PA 05783/19) - the Scheme.
7. On 2nd September 2019, having determined that the Scheme falls within the scope of Schedule 1, (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 and not covered by Category 1) of the *Environmental Impact Assessment Regulations, 2017* (S.L. 549.46), the Environment and Resources Authority (ERA) requested that the Applicant submit a Project Description Statement (PDS) for the Scheme.

ALTERNATIVE SITE SELECTION

8. The Scheme involves the redevelopment and change the use of the manure clamp permitted within the confines of the Applicant's farm under PA 02251/09. As such, the site location was pre-determined and the Applicant did not consider any alternative sites for the Scheme.

Figure 1: Location of the Scheme Site



THE SCHEME

LOCATION OF SCHEME SITE

9. The Scheme site is located at the Furplay Rabbit Farm, off Triq Ħal Far, in Zurrieq, within the Zurrieq Local Council administrative area (see **Figure 1** above).
10. The Scheme site lies in the Rural Area (Outside Development Zone). In the South Malta Local Plan, the site is identified as lying within an 'Agricultural Area' (**POLICY SMAG 01**), as well as a 'Valley Protection Zone' (**POLICY SMCO 07**). **POLICY SMCO 07** provides that in Valley Protection Zones "*there will be a presumption against any development within these areas that will adversely affect the function of the valley as an important water catchment area*".

CHARACTERISTICS OF THE SCHEME SITE

11. The Scheme site occupies an area of approximately 6,850 m². The site includes the entire farm complex as approved under PA 02014/95, PA 02591/96, PA 01548/98, and PA 02505/16. This includes the breeding units, food preparation block, the administration block (and the visitor area approved under PA 02505/16), and a store. The area for the agri-tourism facility (previously the manure clamp approved under PA 02251/09 and renewed under PA 03041/16) is located on the southern portion of the site, an area measuring approximately 1,275 m². Notably, the Scheme does not envisage any extension to the site of the approved manure clamp. **Figure 2** shows the site layout – the existing uses and the manure clamp as approved under PA 02251/09 and PA 03041/16.
12. **Figure 3** shows images of the site as it is currently. As mentioned, the northern part of the site is occupied by the existing farm – the breeding units, food preparation block, and the administration block with visitor's area at first floor. The area in front of (southeast of) the administration block takes the form of a large light-weight structure (open on the sides) which was constructed as an outdoor breeding unit.
13. The area where it is intended to locate the agri-tourism facility has been cleared and substantially excavated, and works have started in pursuance of the permits issued under PA 02251/09 and PA 03041/16. The site has been laid out in terms of the access and the areas for soft landscaping, with the area to be built up having been generally defined. The back (retaining) wall of the building has been part constructed along the northwestern perimeter of the site, as well as parts of the walls on the sides, and the boundary wall along the eastern perimeter of the site. As described below, for the Scheme, the access will remain as is and the landscaped areas will be generally in line with what was approved under PA 02251/09 and PA 03041/16, although there will be an increase in the area dedicated for landscaping due to a decrease in the footprint of the building.
14. No hard surfacing material has yet been laid; the site, including the access, is still in the form of beaten earth. The soil that has been cleared is stockpiled towards the back (southern part) of the site.

15. The Scheme will be accessed from within the existing farm, from the southwestern corner of the farm (the access is already formed, as mentioned). There is one access to the farm complex, from Alley No 2, which takes access off Triq Ħal Far (see **Figure 3**).

CHARACTER OF THE AREA AROUND THE SCHEME SITE

Land Uses

16. A land use survey of the area surrounding the Scheme site was conducted in October 2019. The land uses within approximately 250 m of the site are illustrated in **Figure 4**, and various images of the surroundings are shown in **Figure 5**.
17. The primary land use in the vicinity of the Scheme site is agriculture, in a large part arable fields but with farm complexes and other rural structures. The fields are generally under cultivation. There are two other rabbit farms immediately adjacent to the Scheme site (Xnakk Rabbit Farm and San Carlo Farm).
18. The nearest residential property to the Scheme site lies approximately 190 m (plan distance) to the east of the Scheme site. The Villa Blanche wedding hall is located approximately 195 m (plan distance) to the northwest of the Scheme site.
19. There is an Armed Forces of Malta training facility located approximately 220 m (plan distance) to the west of the Scheme site, and fronting Triq Ħal Far.
20. The boundary of the Malta International Airport lies approximately 400 m (plan distance) to the north of the Scheme site.

Natural and Cultural Heritage

21. The underlying geology of the area in the vicinity of the Scheme site is shown in **Figure 6**. The rock beneath the site is Lower Globigerina Limestone. The Scheme site is not located within a Groundwater Safeguard Zone, the nearest 300 m Groundwater Safeguard Zone buffer lies approximately 80 m (plan distance) from the site (see **Figure 7**).
22. **Figure 8** illustrates the natural and cultural heritage designations in the vicinity of the Scheme site. The Scheme site does not lie within a designated natural heritage site, and there are no such sites in the immediate vicinity of the Scheme site. The nearest natural heritage designation is the Luqa Airport Bird Sanctuary, located approximately 250 m (plan distance) to the north of the Scheme site. The South Malta Local Plan identifies the Scheme site and surrounding area as an 'Agricultural Area', as well as a 'Valley Protection Zone' (Wied Qoton) - see **Figure 9**.
23. The nearest cultural heritage designation to the Scheme site is the Class A scheduled Ta' Ġawhar Roman Tower in Ħal Safi, to the northwest of the site; the buffer zone to the Tower comes to within approximately 710 m (plan distance) of the Scheme site (see **Figure 7**).

Figure 3: Images of the Scheme Site

		
<p>View of the area where the Scheme will be located, looking southeast</p>	<p>View of the area where the Scheme will be located, looking northwest (with the existing farm complex in the background and entrance to the Scheme on the left)</p>	<p>Access to the Scheme from within the farm complex (looking southeast)</p>
		
<p>View of the administration block within the visitor area at first floor level (looking north)</p>	<p>View including the breeding units (looking northeast)</p>	<p>View of the store (looking west)</p>



View of the lightweight structure (looking southeast)



View of the cesspit (looking southeast)



View from the main entrance to the farm complex (looking southeast)



View across the site from the roof of the administration block, showing the breeding units, cesspit and light-weight structure (view southeast)



View across the site from the roof of the administration block, showing the entrance to the Scheme (view southeast)

Figure 4: Surrounding Land Uses



INDICATIVE ONLY - Not to be used for direct interpretation

Figure 5: Images of the Land Uses in the Vicinity of the Scheme Site



Agricultural land



Xnakk Rabbit Farm



Residential property



AFM training facility

Figure 6: Geology of the Area

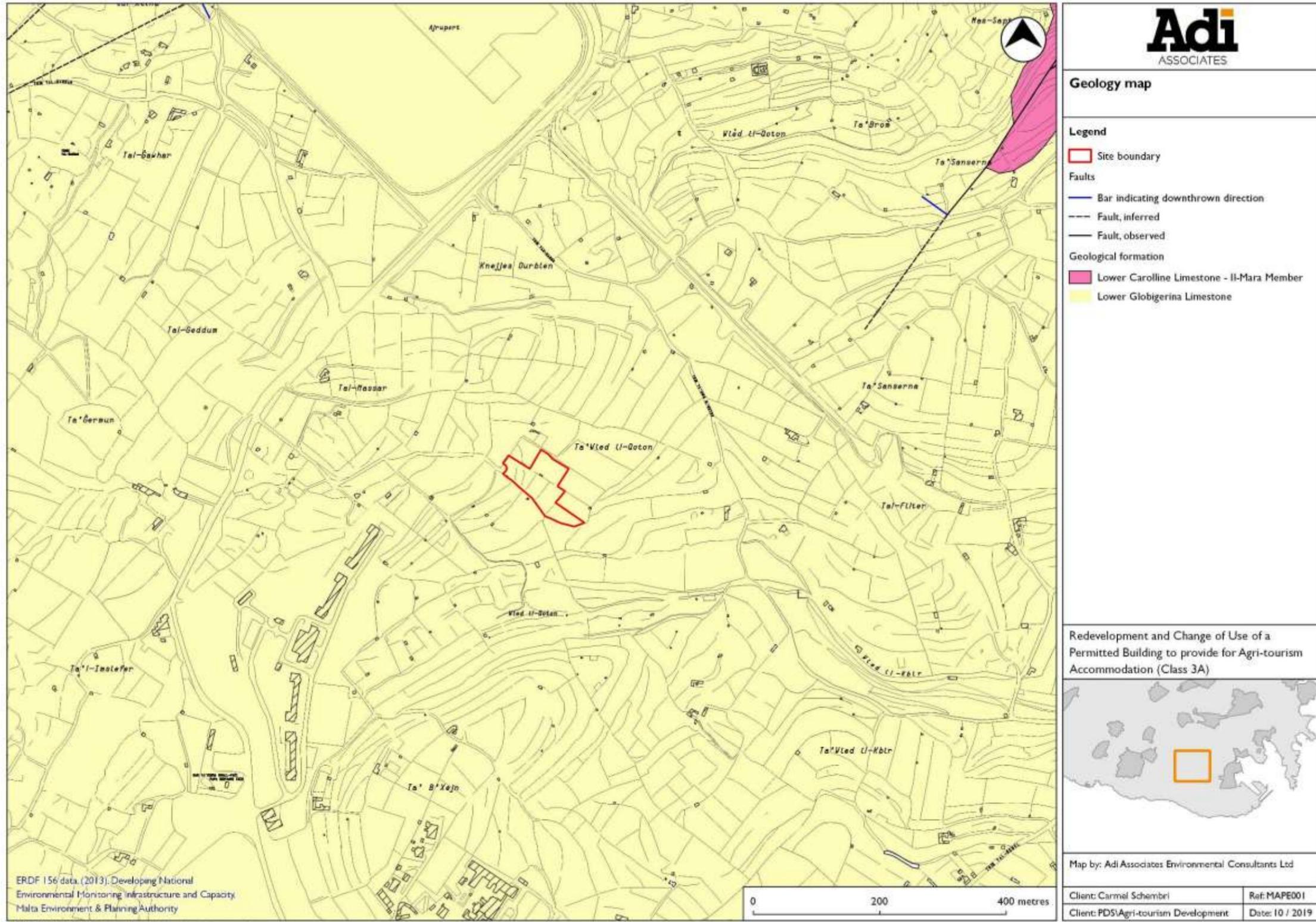


Figure 7: Hydrology of the Area

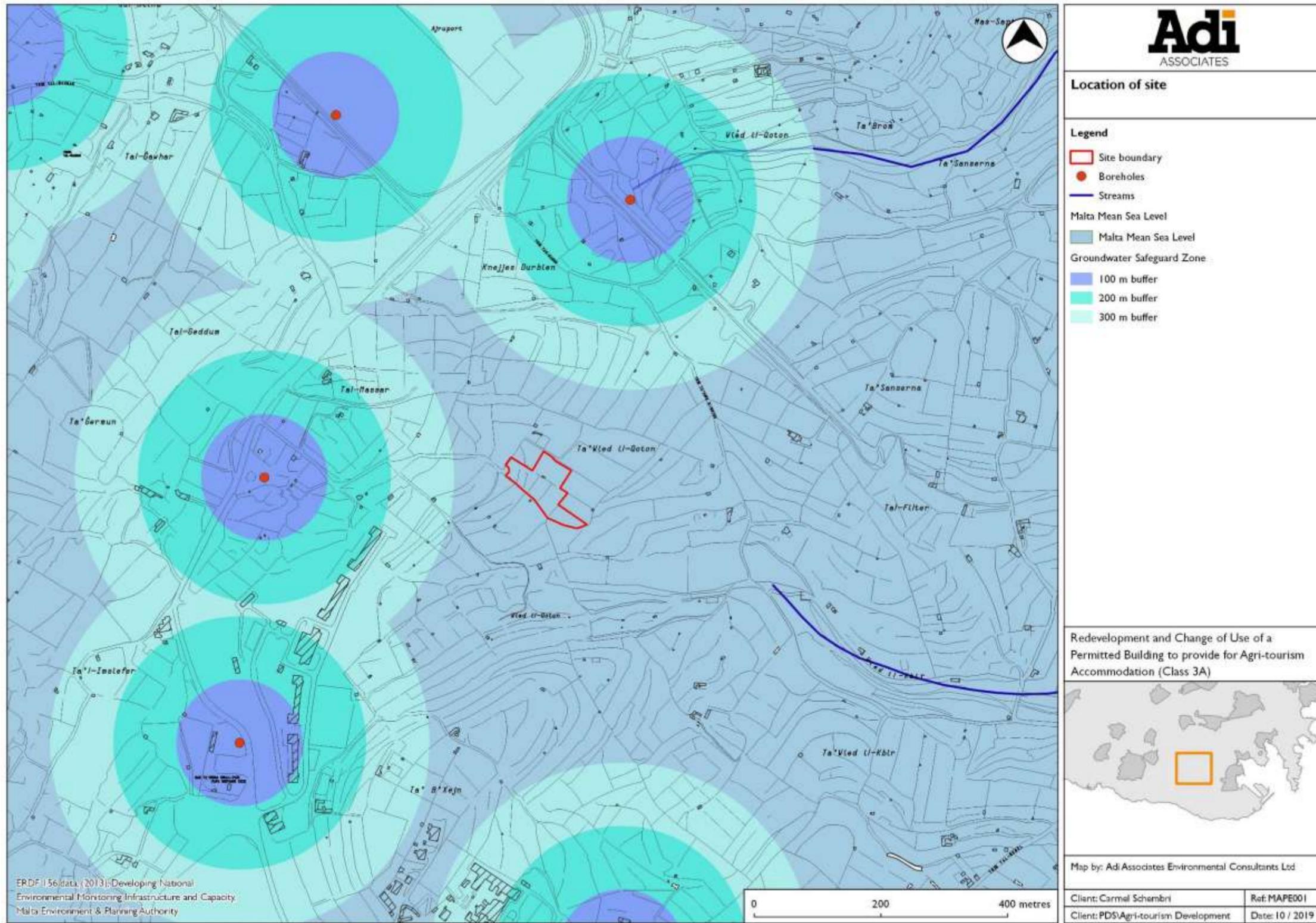


Figure 8: Natural and Cultural Heritage Designations

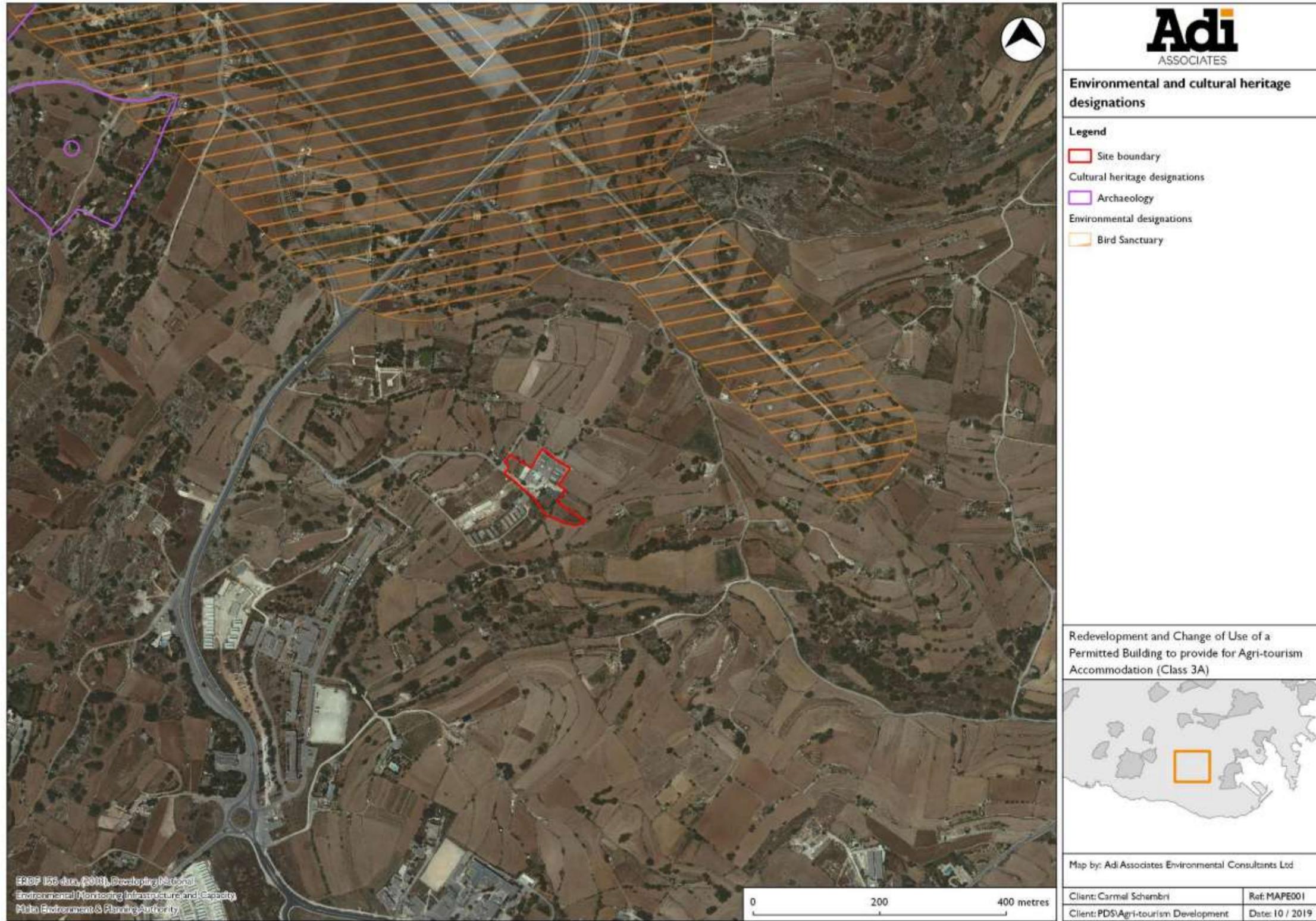
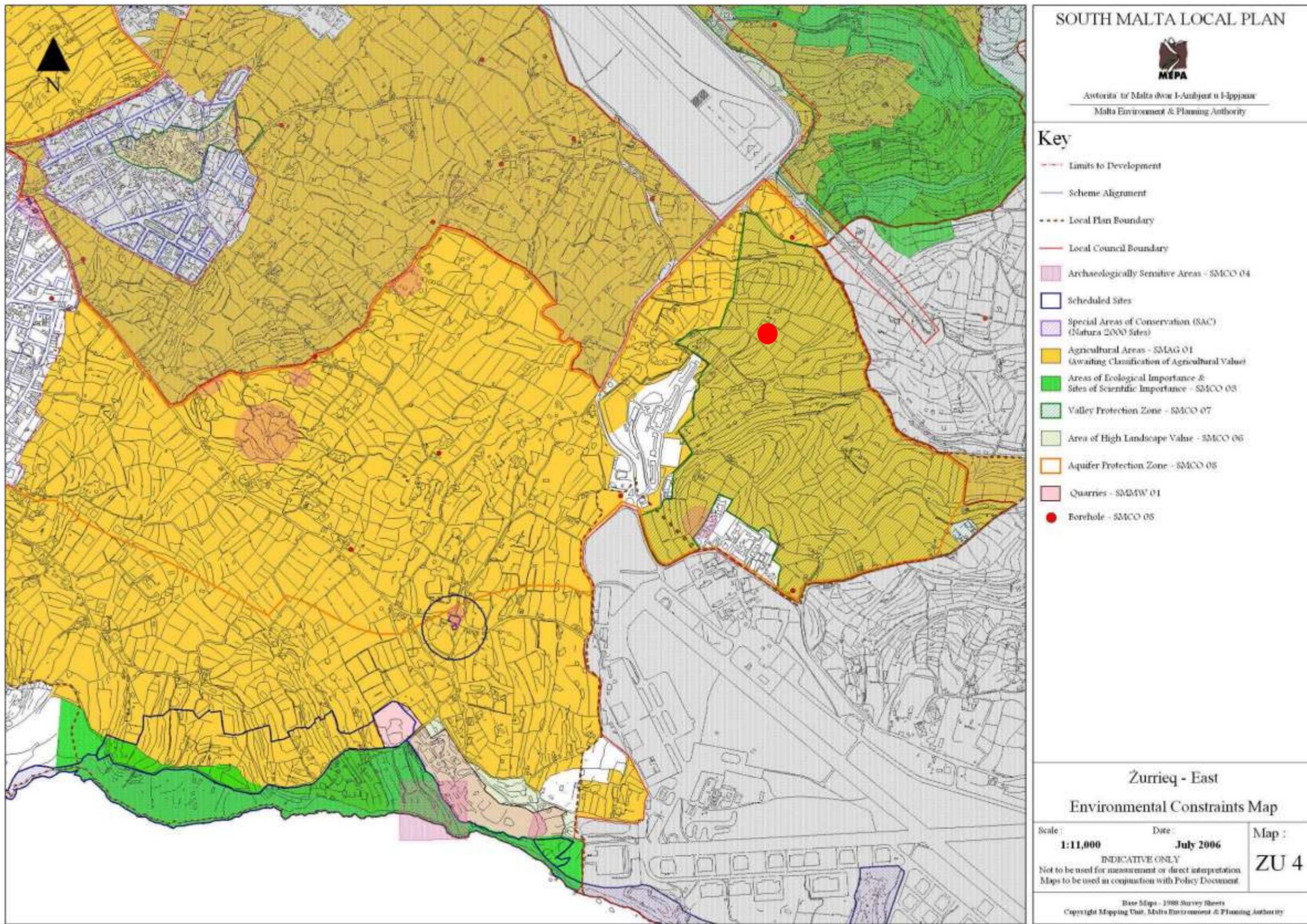


Figure 9: Zurrieq-East Environmental Constraints Map (extracted from the South Malta Local Plan), with Scheme site shown in red



DESCRIPTION OF THE SCHEME

24. The Scheme takes the form of an agri-tourism development comprising 10 guestrooms, together with ancillary facilities in the form of a breakfast / dining area, kitchen, reception area, and an outdoor swimming pool; there will also be shower facilities for the swimming pool. There will be two car parking spaces provided on site, as well as space for service vehicles (for loading / unloading of deliveries and waste).
25. The floor plans, elevation and section drawings for the Scheme are included as **Figures 10 to 16**; these show the Scheme superimposed on the approved plans, elevations and sections for the manure clamp. **Figure 17** shows a section through the entire Scheme site, showing the height of the Scheme relative to the heights of the existing farm buildings; the outline of the approved manure clamp building is also shown. Clean drawings for the Scheme are included as **Appendix I**
26. As mentioned, the layout of the Scheme is very similar to the layout envisaged for the approved manure clamp. The approved part single / part two-storey building will be re-envisaged as the accommodation block. The block will have a modified but overall smaller footprint than the approved manure clamp, as well as a smaller footprint at first floor level, and the overall height will be marginally lower than the approved building. The swimming pool will be provided where it was intended to have hard stand, in front of the accommodation block.
27. The area for soft landscaping will be increased and, where the entire site (including the access road) was envisaged to be concreted under the approved permit, the Scheme envisages a mixture of paving.
28. The changes envisaged by the Scheme will result in a decrease in the building footprint (by approximately 16 m²) and an approximately 75 m² decrease in the hard-surfaced area, both through an increase in the area for soft landscaping (additional approximately 14 m²) and taking account of the swimming pool. There will be a marginal increase in the Gross Floor Area (GFA) of the building, by approximately 30 m². The GFA of the approved manure clamp was approximately 1,057 m²; the GFA of the proposed building will be approximately 1,087 m².
29. The accommodation block will have a similar height and massing as the approved building. The approved manure clamp building had a maximum height of approximately 6.7 m. For the most part, the new building will have a maximum height of approximately 7 m (the lift well will be 7.8 m high); however, the finished floor level at ground level building will be 0.3 m lower than that of the approved building. The accommodation block will also be lower than the heights of the existing buildings within the farm complex, where the site levels drop by approximately 2 m at the interface on the northwestern boundary of the accommodation block with the remaining area of the farm.
30. The landscaping proposal is shown on **Figure 18**. As mentioned, the area for soft landscaping will be increased from what was approved. It is proposed to use a mix of species in the planting: *Olea europaea* (Olive tree); *Arbutus unedo* (Strawberry tree);

Chamaerops humilis (Dwarf Palm); *Ficus carica* (Fig tree); *Punica granatum* (Pomegranate tree); and *Morus nigra* (Black Mulberry tree). All of these species are considered to be appropriate in this rural location.

31. The external lighting regime will involve the use of full cut-off lighting fixtures to illuminate the walkways and the area around the pool. As explained by the Applicant, the lighting along the pathways will be motion-sensored and the lighting regime as a whole will be designed so as to avoid light spill and taking account of the rural location and the objectives for 'dark skies.

Figure 10: Ground Floor Level



Figure 11: First Floor Level



Figure 12: Basement Level

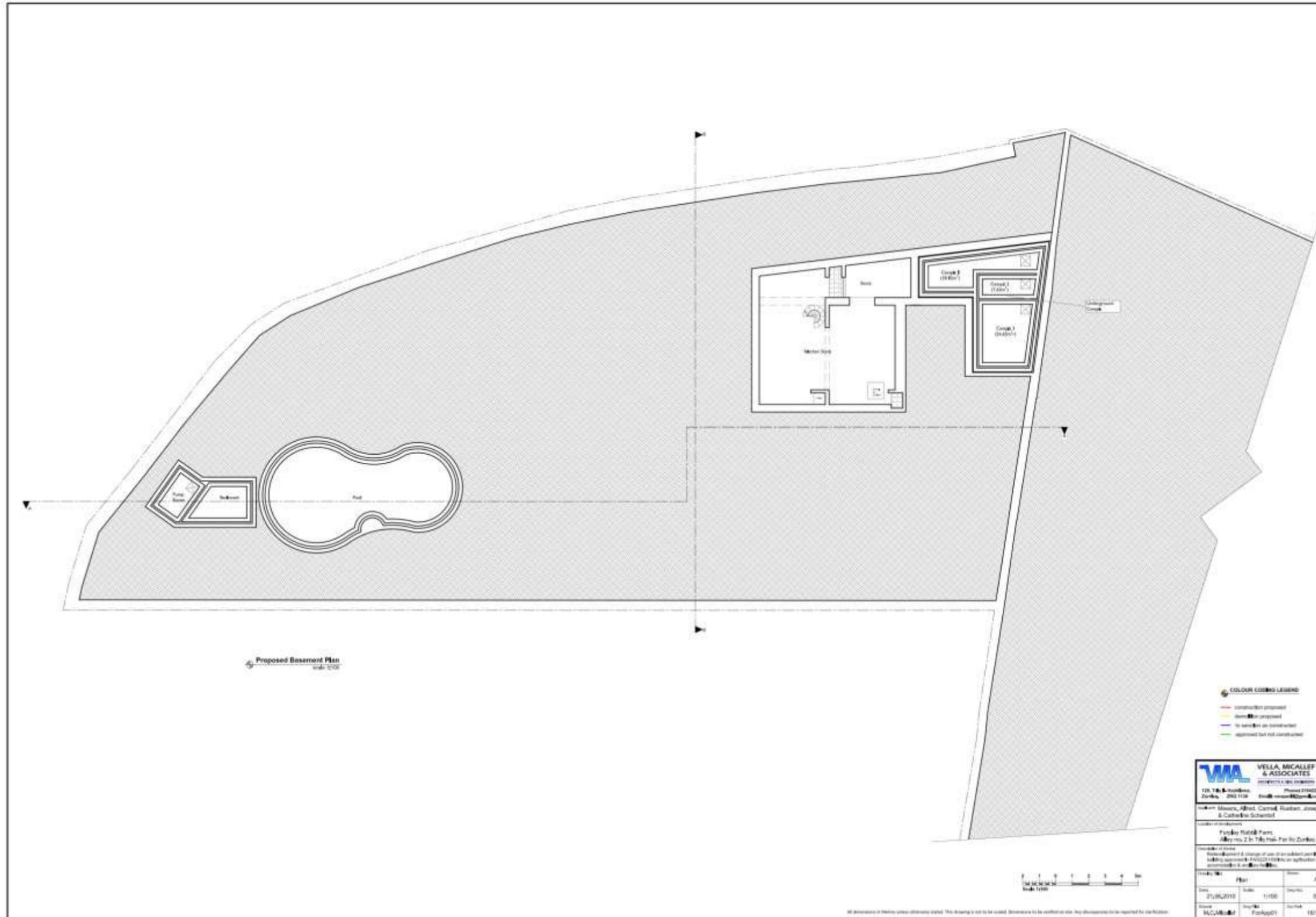


Figure 14: Elevations A

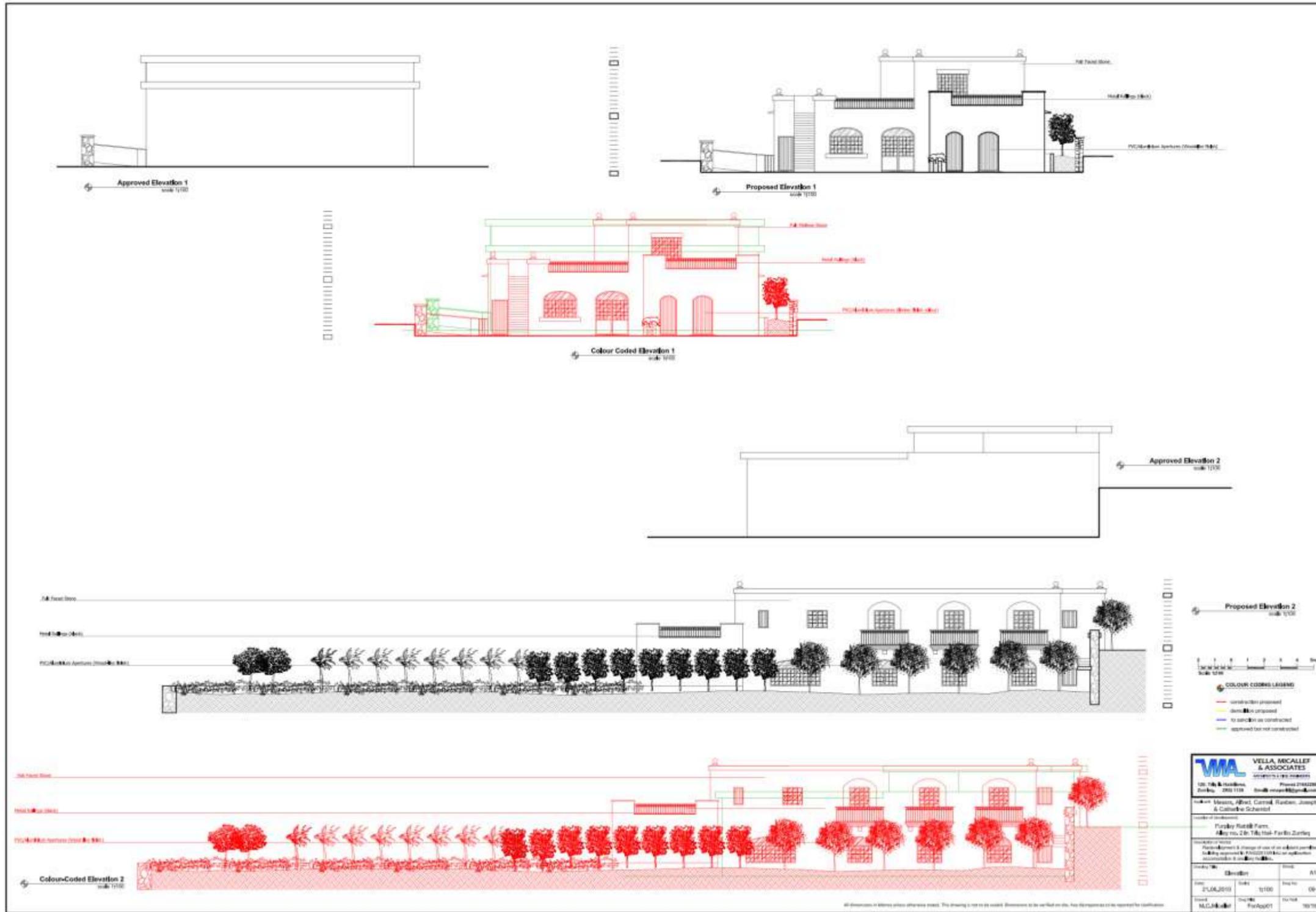


Figure 15: Elevations B

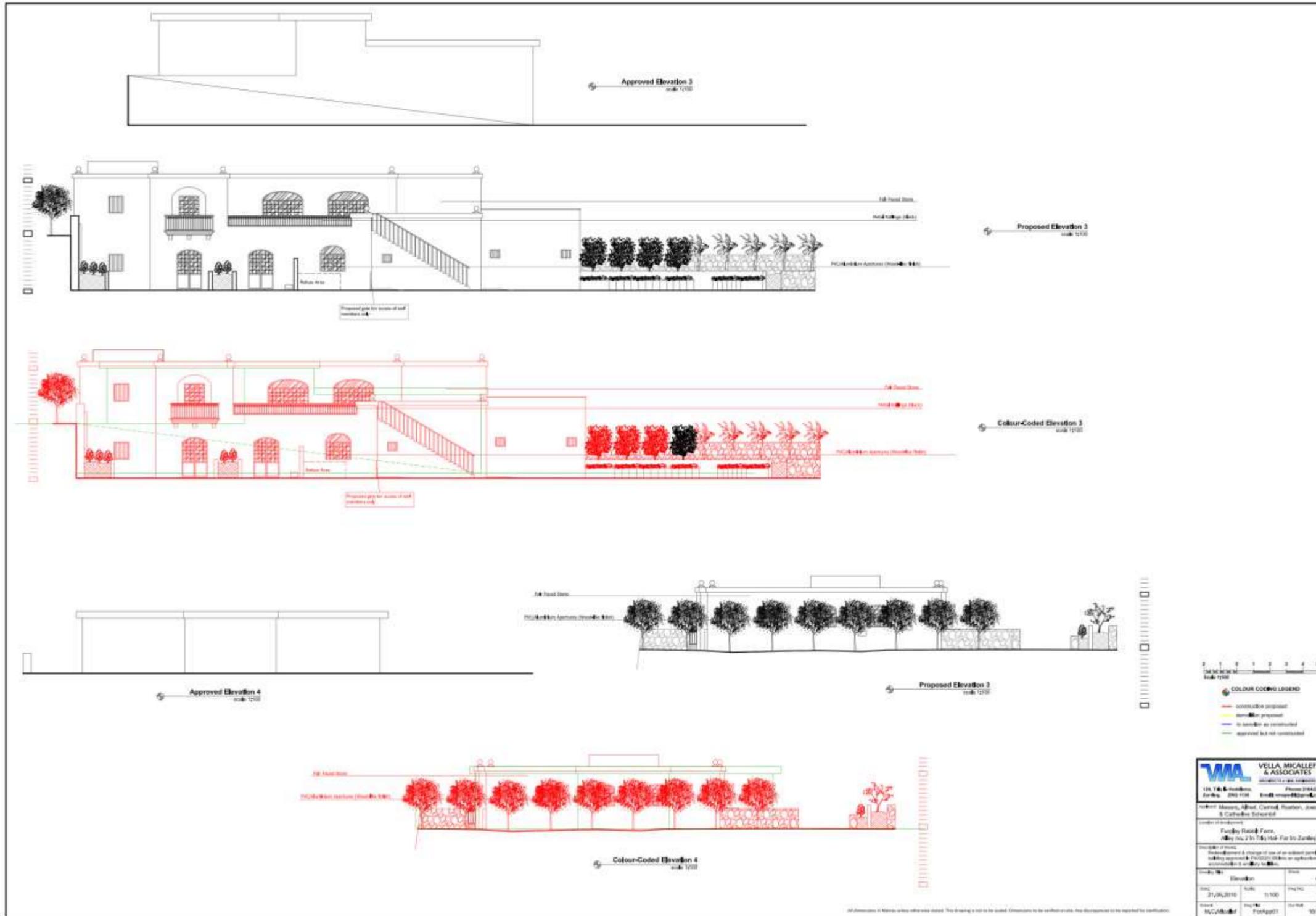


Figure 16: Sections A

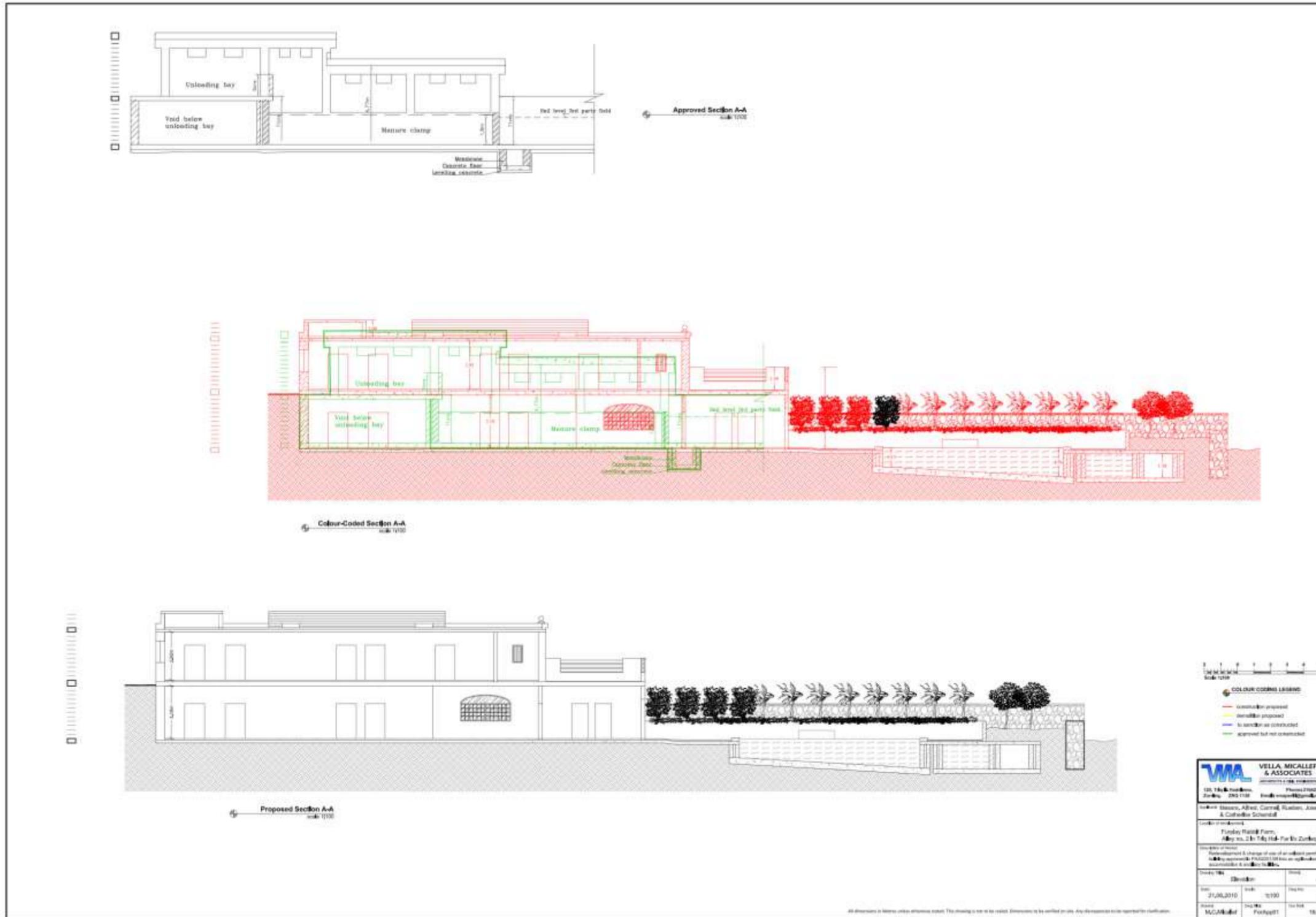


Figure 17: Sections B

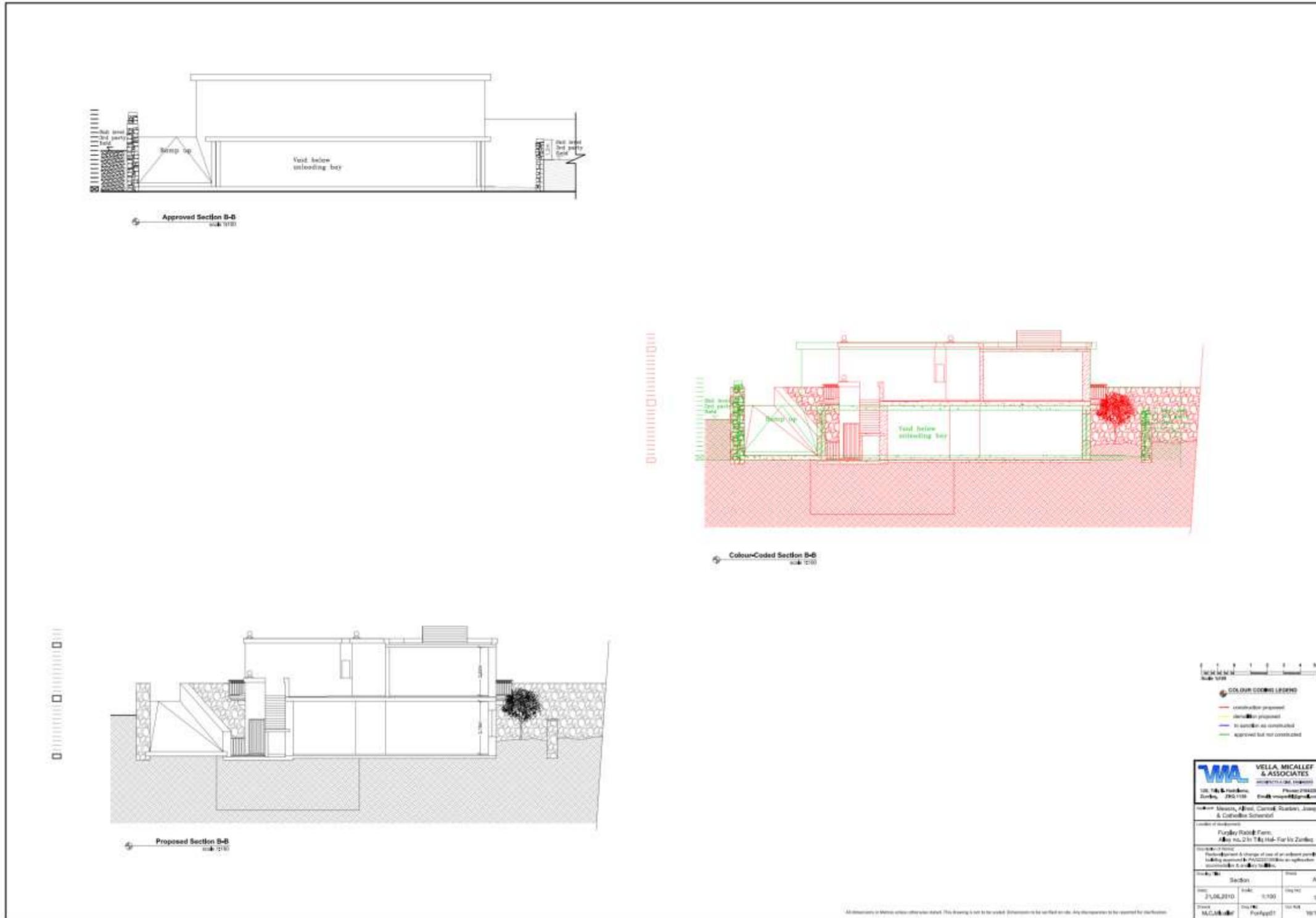


Figure 18: Sections through Scheme Site

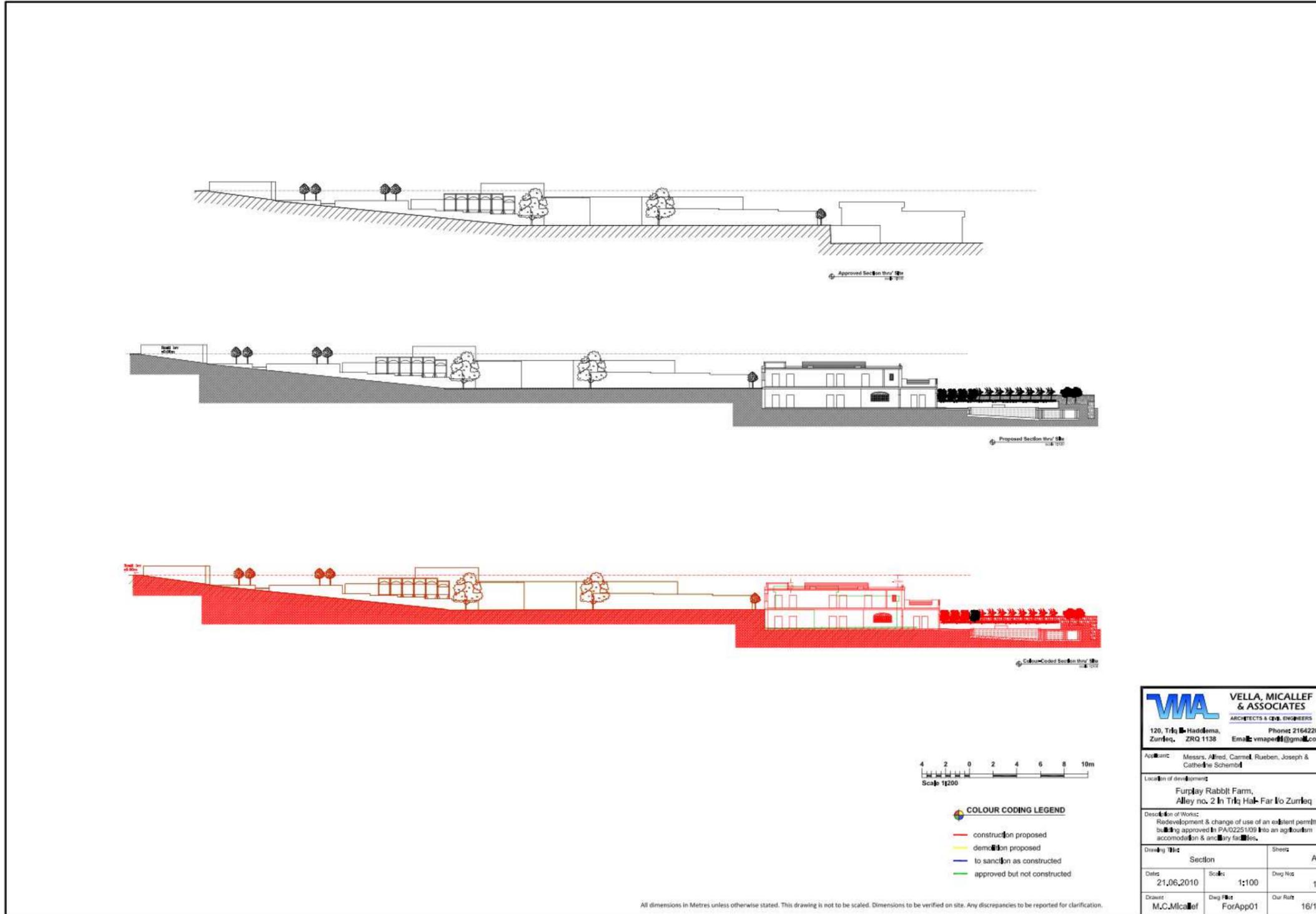


Figure 19: Landscaping Proposal



RESOURCES

Energy

32. All energy used currently in connection with the farm complex is obtained from the mains electricity supply. As explained by the Applicant, on-going discussions with Enemalta suggest that the existing 3-phase lines, with a 3-phase meter connection, will be sufficient to serve the additional demand of the Scheme.
33. The Applicant explains that there will be a number of in-built measures to reduce energy consumption, including:
- Passive design aimed at maintaining inside temperatures all year round, through the construction of the envelope of the building in double soft stone walls with 50 mm cavity, the use of insulation in the floors and ceilings, and the installation of double-glazed apertures;
 - Installing air-conditioners and water heaters with inverter systems;
 - Using LEDs for internal and external lighting; and
 - Using high performance with low consumption and minimal energy loss kitchen and preparation area equipment.
34. It is also proposed to install photovoltaic panels (PV) of 20 kW_p, estimated to generate approximately 32,000 kWh annually. These will be installed on the roof of the accommodation block, around the services area (see **Figure 13**); the Applicant explains that the PV panels will be placed as horizontally as possible, to reduce their potential visual impact. It is envisaged that the Scheme will have an annual electricity consumption in the range of approximately 32,850 kWh. Hence, approximately 97% of the electric energy for the Scheme will come from a renewable source.

Water

35. The Applicant explains that the intention is to recycle as much water as possible. It is envisaged that the daily water consumption of the Scheme will be in the range of approximately 1,700 litres. It is envisaged that approximately 1,460 litres (86%) will be recycled as grey water, for flushings and for irrigation on site. The remaining approximately 240 litres (from toilets) will be collected in an underground cesspit (see **Figure 11** above) and collected and disposed of in accordance with national regulations. A separation system will be built in, with separate drains from the showers / wash hand basins and from the toilets. Grey water will be pumped to a rooftop tank, filtered and stored in separate cesspit (see **Figure 11**). The rooftop tank is envisaged to be located within the identified 'services' area (see **Figure 13**). The precise details of the recycling plant are not yet finalised; however, the plant will be constructed in accordance with all relevant regulations and the detailed plans submitted at a later stage, as necessary. Importantly, there will be no discharge from the plant to the surrounding environment.

36. There is an existing large rainwater reservoir on site, located to the north of the proposed accommodation block (see **Figure 2** above); this has a capacity of approximately 950 m³. The rainwater falling on the roof of the accommodation block will be directed to this reservoir.

Raw Materials

37. **Table I** provides estimates of the raw materials required for the construction of the Scheme.

Table I: Estimated Raw Materials for Construction

Material	Estimated Volume
Hollow concrete blocks	4,400 bricks
Other concrete materials (e.g. strip footing, blinding, floor slabs, infill, screeds, stairs, floors, beams, roof slabs)	490 m ³
Steel mesh (as reinforcement in concrete slabs)	850 m ²
Steel bars (reinforcement in concrete)	4 t
Limestone blocks	15,000 blocks
Damp proof course	250 m
Geotextile membrane	500 m ²
Bitumen rubber paint	860 l
Gypsum plastering	2,150 m ²
Soft stone pointing	750 m ²

WASTE MANAGEMENT

Construction Phase

38. Waste generated during construction will primarily consist of excavation waste, although the site for the Scheme has already been substantially excavated to the levels required for the Scheme, and pursuant to the permit issued under PA 02251/09. Further excavation is required for the proposed basement, swimming pool and the cesspits. A relatively small amount of excavation waste will be produced - approximately 600 m³. The Applicant has explained that approximately 30% of the excavated stone will be re-used on site, as a back fill; the remainder will be deposited at a licensed facility.
39. As mentioned, the soil that has been cleared is still on site (currently stockpiled in the southern part of the site); this soil measures approximately 850 m³. It is intended to use part of the soil for the landscaping on site; the remainder will be spread on the adjacent fields, which are owned by the Applicant.
40. Concrete / brick cut-offs and waste ceramics and tiles produced during construction will also be disposed of at a licensed facility. Waste metals (rebar cut offs) will be

sold as scrap. The municipal wastes produced during construction (paper and cardboard, glass, and biodegradable kitchen and canteen waste) will be disposed of a licensed facility.

Operational Phase

41. The principal wastes envisaged to be generated by the Scheme will be municipal waste, including kitchen waste. This type of waste is already produced on site, in relation to the existing farm complex. As mentioned, the number of guest rooms will be 10 and, as described below, the net increase in staff will be two persons. The amount of domestic waste currently produced is relatively minimal. Based on the proposed number of guests and additional staff, the Scheme will likely result in a marginal amount of operational waste being produced.

CONSTRUCTION TIMING

42. The estimated duration of the construction phase of the Scheme is envisaged to be approximately three and a half years, with the remaining excavation and site clearance envisaged to take approximately two months and the construction and finishing approximately 39 months.

CONSTRUCTION MACHINERY

43. The machinery that will be required during construction of the Scheme is estimated to comprise the following:
 - Hydraulic Excavator;
 - Shovels;
 - Mobile crane;
 - Tipper trucks;
 - High-up truck;
 - Concrete pump;
 - Scaffolding; and
 - Hand-held tools (driller, chaser, etc).

EMPLOYMENT

44. It is envisaged that there will be approximately two persons employed on site during the excavation and site clearance, three persons during the construction stage, and four persons during the finishing stage of the Scheme.
45. It is envisaged that there will be three staff employed when the Scheme comes into operation; one of these is already employed on site, in connection with the existing farm.

POTENTIAL ENVIRONMENTAL IMPACTS

46. Environmental impacts can be negative as well as positive and their assessment is important so as to better define the effects that a proposal may have on its receiving environment. At this stage in the process, a preliminary list of the potential environmental impacts from the construction and operation of the Scheme can be identified. The list identifies only those potential impacts that could be significant.
47. Identification of the potential impacts also takes account of the fact that permission has been granted on the Scheme site for a manure clamp (under PA 02251/09), and that works pursuant to that permit have started. The potential impacts of the Scheme are also considered in this context.
48. The potential significant impacts from the construction and operation of the Scheme are considered to be:

- **Impacts on geology and geomorphology**, *from site excavation.*

As mentioned, the site has already been substantially excavated to the levels required for the Scheme (pursuant to the permit issued for the manure clamp). However, further excavation is required for the proposed basement level, as well as the swimming pool and the cesspits, and any extraction of mineral resources has an impact on geology and geomorphology. The Scheme will involve the further excavation of approximately 600 m³ of material (Lower Globigerina Limestone). It is envisaged that approximately 30% of the excavated stone will be re-used on site. The topsoil has already been cleared from the site (also pursuant to the permit issued for the manure clamp) but is still on-site (approximately 850 m³). It is envisaged that some of this will be reused on-site, with the remainder being spread on the adjacent fields, which are owned by the Applicant.

- **Impacts on landscape and visual amenity**, *arising from the construction and operation of the Scheme*

The Scheme will result in modification to the appearance and character of site as it is currently, through the physical interventions as well as the change in activity on the site. However, where there is already permission for a manure clamp on the site, it is considered that the Scheme offers a potentially better option in respect of visual amenity and rural character. As mentioned, the layout of the Scheme is very similar to the layout envisaged for the approved manure clamp, and the proposed accommodation block will be similar in scale, height and massing, but will have an improved design and visual appearance.

There are relatively restricted views of the site, especially from the north. It is unlikely that the Scheme will be visible from the public road network, with the exception of parts of Triq Wied il-Qoton to the east. The site is exposed to the south, southeast and southwest; however, there is little in the way of sensitive receptors in this area, and it is unlikely that the Scheme will be visible from Triq tal-Ġebel or from Triq Ħal Far to the south / southwest. Furthermore, as

mentioned the site is at a lower level than the existing farm complex; as viewed from the south, the accommodation block will be relatively lower in height than the existing buildings on the farm, as well as the other existing buildings in the immediate vicinity.

- **Impacts on agriculture**, *arising from the construction and operation of the Scheme*

Although the site has already been substantially excavated, there could be some negative impacts on the adjoining agricultural land from dust deposition during the remaining excavation and the construction of the Scheme. With proper adherence to the *Environmental Management Construction Site (Amendment) Regulations 2007*, and with the appropriate mitigation measures in place, dust impacts during construction could be limited.

The Scheme has the potential to have a positive impact on the rural economy, arising from the diversification of the farming activity on site to include an agri-tourism element.

- **Impacts on air quality**, *arising from the construction and the operation of the Scheme.*

It is expected that there will be some dust generated during excavation and construction, as mentioned; however, the potential impacts are likely to be short term, temporary and localised, and, with proper adherence to the current construction site regulations, dust impacts during construction could be limited.

There may be increased emissions from operational traffic as a result of the Scheme, with impacts on the air quality on Alley No. 2. However, there are no residential sensitive receptors along this road and, given the scale and nature of the Scheme, the change to the air quality is anyway unlikely to be significant.

Having regard to the permission for a manure clamp on the site, it is considered that the Scheme offers a better option for maintaining localised air quality, in respect of odours.

- **Noise impacts**, *arising from the operation of the Scheme.*

There may be increased traffic noise as a result of the Scheme, with impacts on the noise climate on Alley No. 2. Again however, there are no residential sensitive receptors along this road and, given the scale and nature of the Scheme, the change in the noise climate is anyway unlikely to be significant.

- **Waste impacts**, *arising from the construction and operation of the Scheme.*

The construction phase will generate mostly inert and non-hazardous wastes, which will be reused, recycled or disposed of at authorised waste management facilities, in accordance with regulations. A CMP addressing waste management will be in place and the applicant will be required to adhere to the current construction site regulations. During operation, the Scheme will generate

primarily domestic waste, including kitchen waste. Based on the proposed number of guests and additional staff, the Scheme will likely result in a marginal amount of operational waste being produced.

- **Impacts arising from construction activities**, *in relation to noise, vibration, dust, and surface water management.*

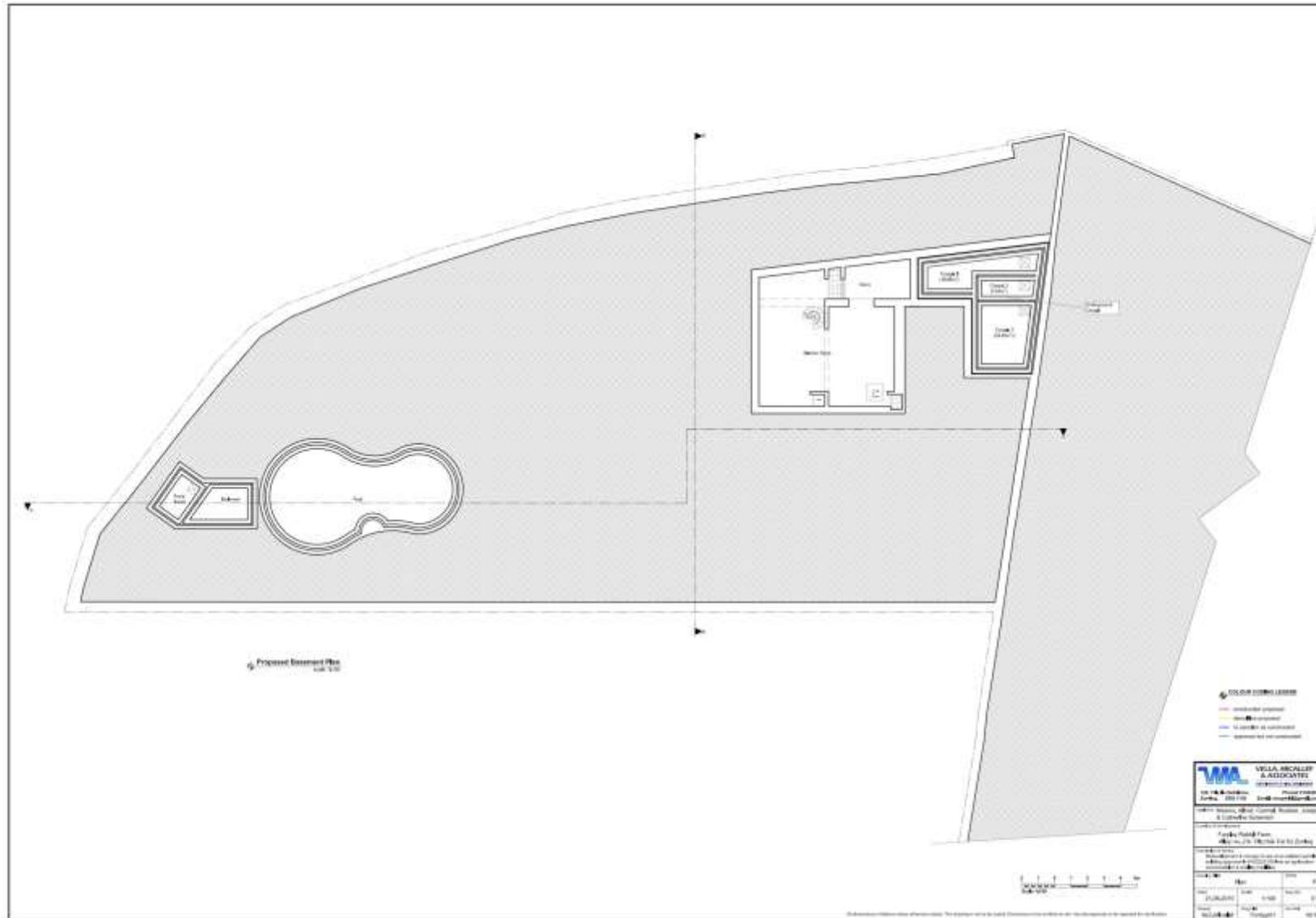
The potential impacts arising from dust emissions during construction are identified above. Any noise and vibration emissions arising during the construction of the Scheme are also likely to be short term and temporary. There is the potential for surface water run-off to impact on the water systems in Wied il-Qoton. Again, with proper adherence to the current construction site regulations, and with the appropriate mitigation measures in place, these impacts could be limited. Measures for mitigating the impact from construction activities, including water run-off, will be addressed in the Construction Management Plan (CMP).

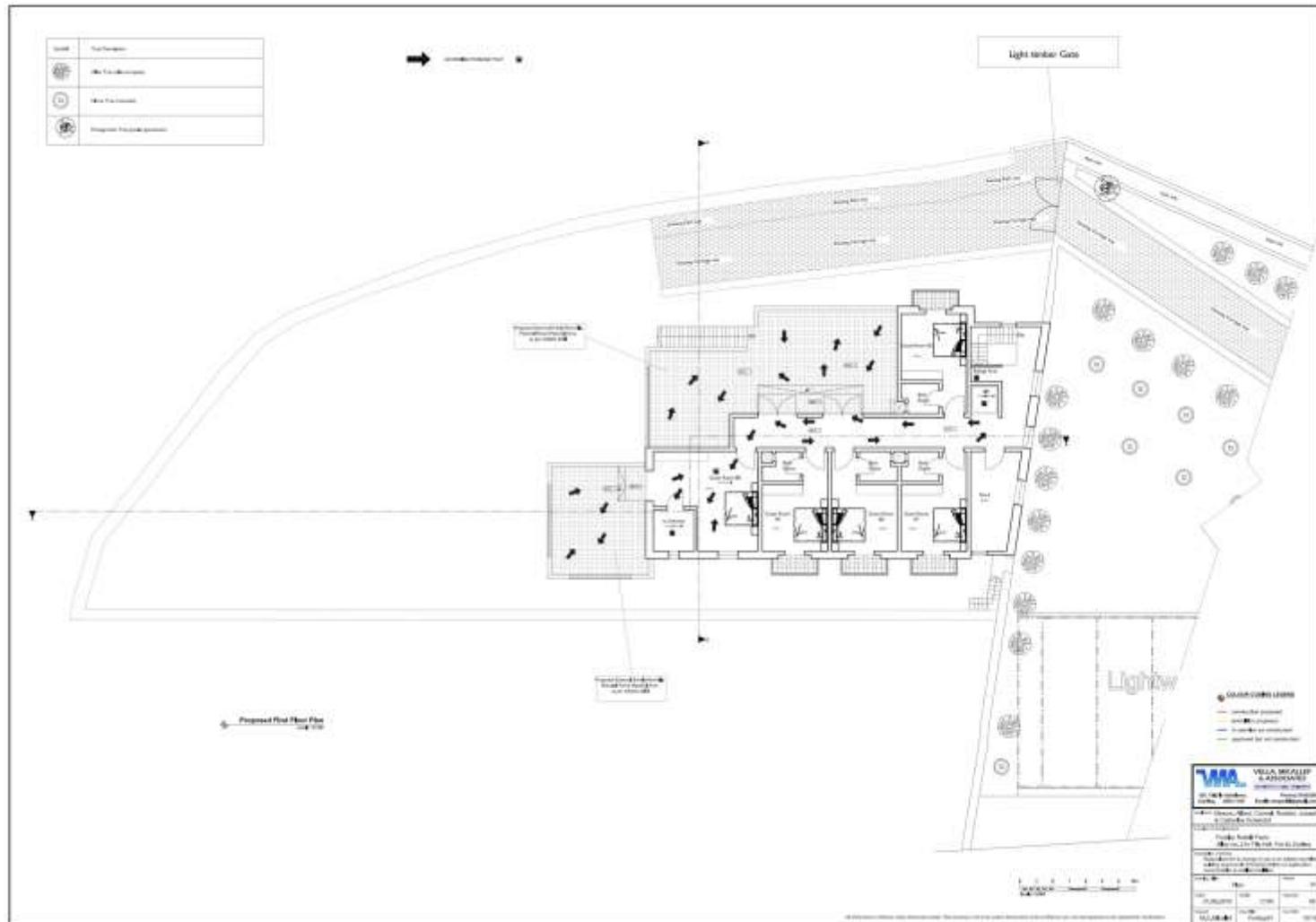
MITIGATION PROPOSALS

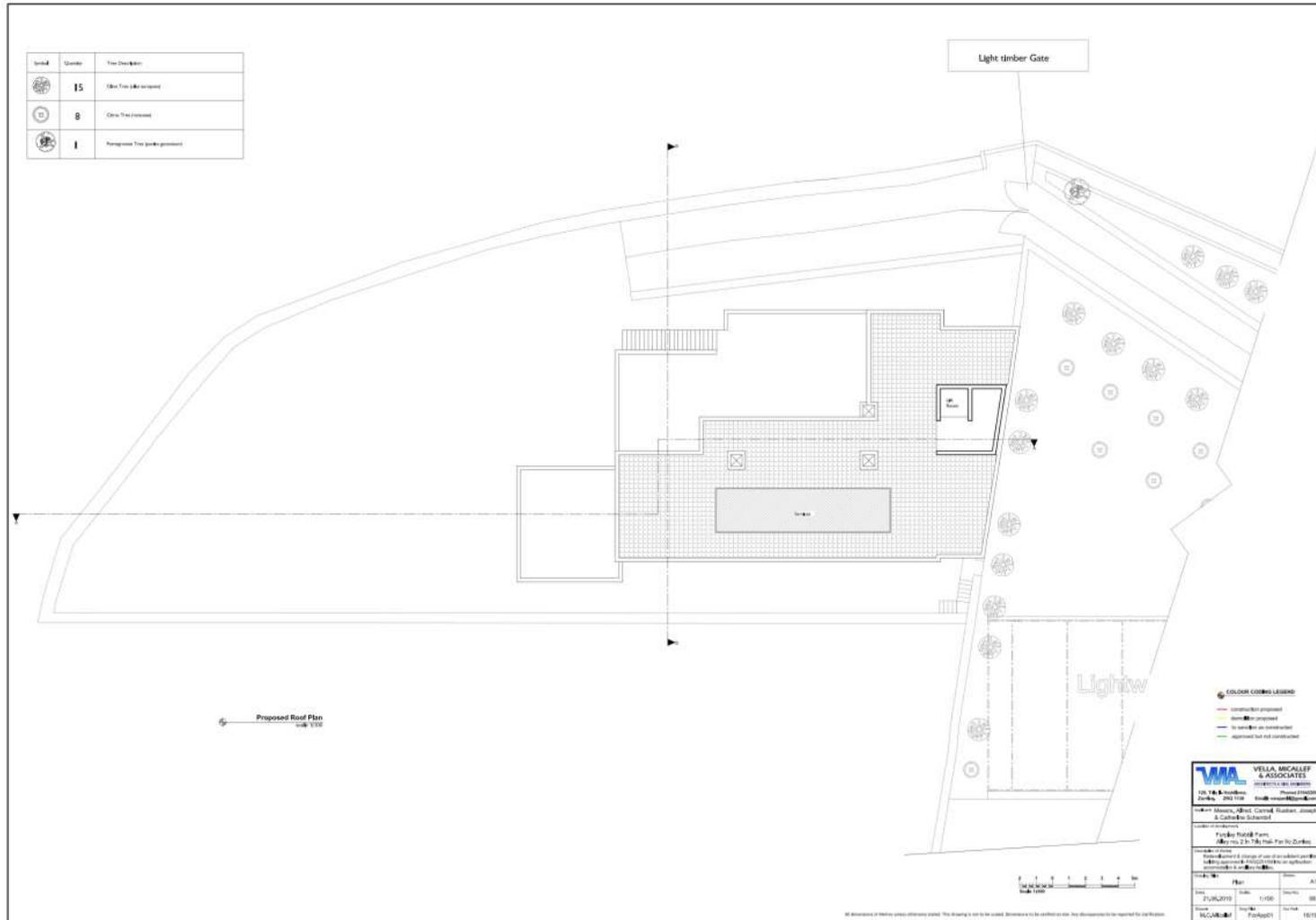
49. Preliminary potential mitigation measures associated with the identified impacts arising from the Scheme include:

- Careful consideration of the design approach for the Scheme, having regard to the rural location and character, and in order to minimise the impact of the Scheme on the rural landscape character and on visual amenity generally;
- Careful consideration of traffic, both during construction and following the coming into operation of the Scheme, including through the inclusion of measures addressing construction traffic arrangements and the putting in place of measures to reduce the volume of private car traffic to / from the site during operation;
- Ensuring compliance with waste management regulations and the adoption of best practice in relation to operational waste management; and
- Ensuring the adoption of best practice environmental measures throughout the construction, including measures for mitigating noise, vibration, and dust impacts on air quality from the construction works (including construction traffic), as well as managing surface water, and the putting in place of appropriate operational monitoring regimes.

Appendix I: Scheme Drawings







All dimensions in inches unless otherwise noted. This drawing is not to be used, reproduced or modified in any way without the written consent of Veva, Bicallet & Associates.