

The Executive Chairperson  
Planning Authority  
St. Francis Ravelin,  
Floriana

Date: 13/11/2019  
ERA Ref: EA 0016/19

Dear Sir,

**Planning Ref.:** PA 1529/19

**Description of proposal:** Outline application for construction of Class 3B hotel with related amenities and to establish building envelope.

**Location:** Site at, Triq Mikiel Anton Vassalli c/w, Triq il-Baltiku, San Giljan

#### **Environmental Impact Assessment Regulations, 2017 (S.L. 549.46)**

Reference is made to your consultation on the above application which the ERA received on 17<sup>th</sup> October 2019.

ERA's recommendation and representation on the said development proposal are being lodged in its capacity as an external consultee and an interested party in accordance with the Development Planning Act and the Development Planning (Procedure for Applications and their Determination) Regulations, 2016 (Legal Notice 162 of 2016).

The PDS was reviewed and the proposed development was screened against the Environmental Impact Assessment Regulations, 2017 (S.L. 549.46). It was determined that the proposed development falls under Schedule I, Category II, Section 7.1.2.1 - *Projects which have: (ii) a gross floor area of 30,000m<sup>2</sup>* and would require an EIA in view that the EIA Screening (Annex I) identified unclear and potentially significant impacts.

Whilst the site per se is of limited sensitivity, ERA has concerns on the intensive development of one of the few remaining green lungs in the area, also noting that the proposal is not in line with the established zoning for the site as a 'public open space' in the local plan. This basic concern relating to the local plan zoning needs to be addressed directly through the mainstream development consent mechanism, before deciding to undertake an EIA that would study in greater detail the specific impacts identified in the EIA Screening.



Yours faithfully,

Stephanie Farrugia  
Senior Environment Protection Officer  
f/Director of Environment and Resources

---

***Disclaimer***

*The above comments are being issued without prejudice to any additional issues which are regulated by ERA through any relevant environmental permitting and, or compliance mechanisms, as well as to any environmental considerations that may be beyond the scope of the application under consideration.*

*The above assessment is based on the information provided to ERA in the application. Should it result that such information is incorrect, incomplete or misleading, or in the event of any omissions, or subsequent modifications, amendments or changes to the proposal application and/or related submissions, the above assessment (including any favourable consideration, lack of objection, any proposed conditions or lack thereof, or any other equivalent stance, etc.) may need to be reopened to ERA's satisfaction. ERA shall not take responsibility for comments, assessments or judgments based on information that is incorrect, incomplete, missing or misleading, and which is only discovered after its assessment, nor for any environmental impacts resulting from developments which it was not specifically consulted on. Furthermore, ERA also retains the right to take additional action should the information provided, or any incorrect, incomplete, missing or misleading details, be tantamount to fraud.*