

# ANNEX I

## Environmental Impact Assessment

### Schedule III

(Screening according to S.L. 549.46)

<b>ERA Reference no.:</b>	EA 0016/19
<b>PA Reference no.:</b>	PA 1529/19
<b>Project Title:</b>	Outline application for construction of Class 3B hotel with related amenities and to establish building envelope.
<b>Location:</b>	Site at, Triq Mikiel Anton Vassalli c/w, Triq il-Baltiku, San Giljan
<b>Screening date:</b>	October 2019

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#### 1. Outline of Proposal

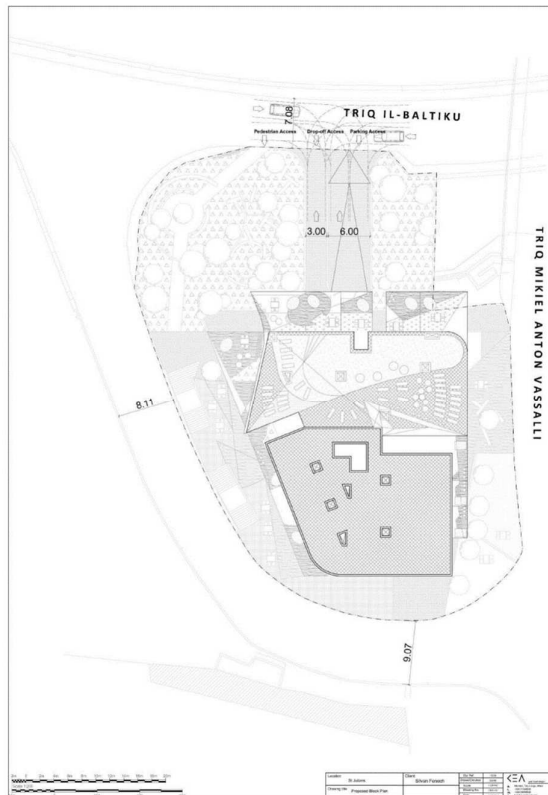
- 1.1 The proposal is an outline development application to construct a Class 3B hotel with associated facilities in a vacant plot of land engulfed between Triq Mikiel Anton Vassalli and Triq il-Baltiku, San Giljan. The entire proposal will have a gross floor area of circa 30,000sqm and will span a height of 26 floors with the proposed hotel occupying a height of 21 floors and 5 floors of commercial space (vide figs. 1 & 2). An additional 5 floors will be reserved for commercial space and the entire footprint of the site will be excavated to provide two levels of underground parking and an underground level for utilities related to hotel operations (vide photos 1 & 2). The hotel will have between 250 to 300 rooms for accommodation.



**Photo 1:** Visual impression of the proposed high-rise building. *Source:* PDS pg.12



**Photo 2:** Visual impression of the proposed high-rise building. *Source:* PDS pg.14



**Figure 1:** Proposed Ground Floor Plan. *Source:* PDS pg. 24

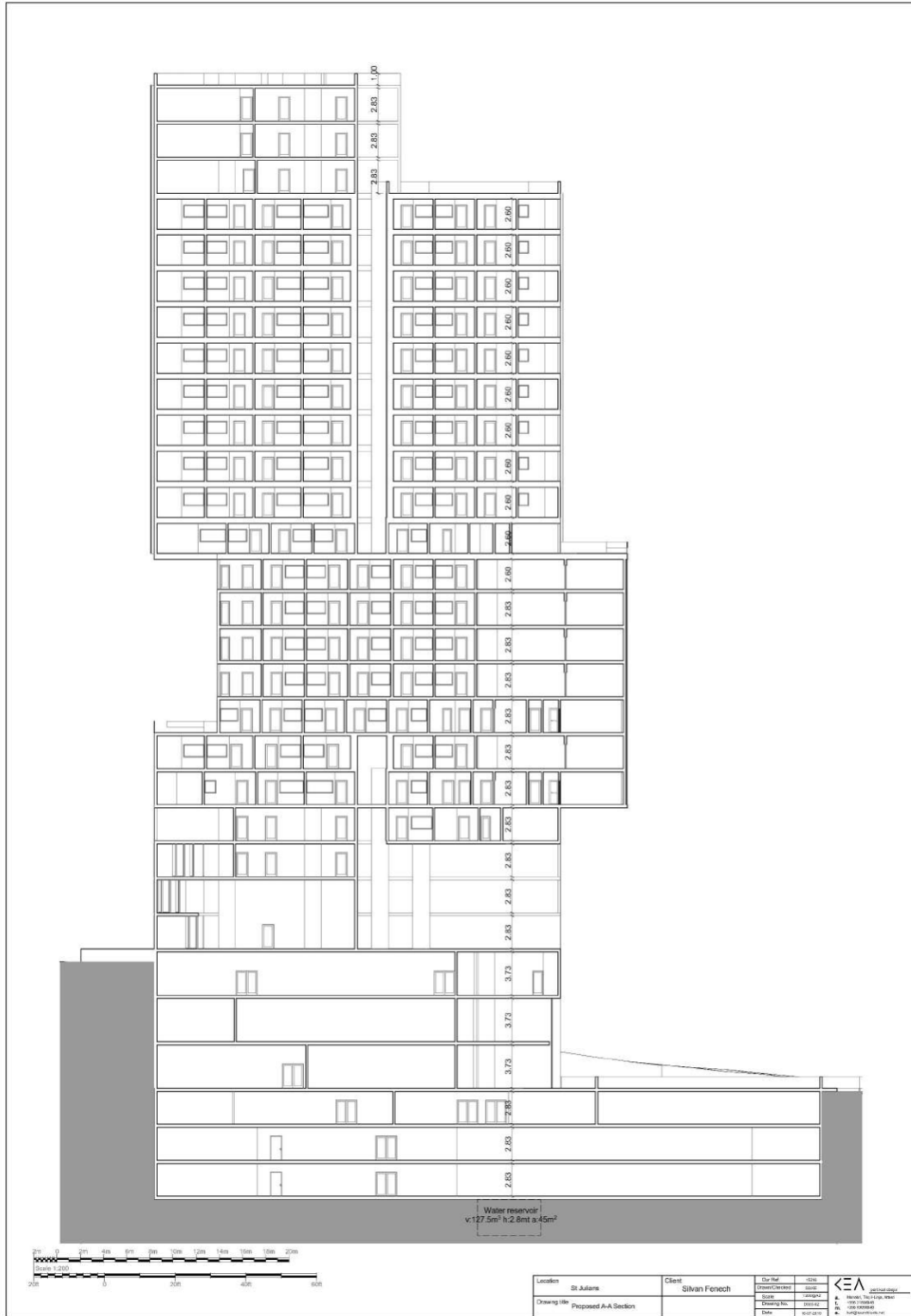


Figure 2: Proposed Section. Source: PDS pg.25

## 2. Site Context

- 2.1 The site earmarked for the proposal is located within the development zone at the road junction of Triq Mikiel Anton Vassalli, c/w Triq il-Baltiku, in the locality of San Ġiljan, accessed through the road leading from the left hand side of Triq MA Vassalli at the north end of the Regional Road Tunnels (vide photo 2). This particular junction is identified in the North Harbours Local Plan for improvement (Map SJ2). The site is a remnant plot of land with an area of approximately 3,000m<sup>2</sup> which used to form part of Wied Ġhomor valley side prior being cut off as part of the road junction design. It is presently a planted area containing a number of trees (vide photo 3). There is a sharp drop in site levels demarcated by a retaining wall forming part of the flyover (vide photo 4). The site is identified by the North Harbours Local Plan, 2006 as “Public Open Space” (Map SJ2) and is safeguarded by the provisions of policy NHRL 01 which prohibits the loss of urban public open spaces (vide fig. 3).
- 2.2 The site overlooks the valley system of Wied Ġhomor which is scheduled as per Government Notice 409 of 1999 for its ecological and scientific importance.
- 2.3 The site is located at a distance of circa 130m from the Libyan Higher Vocational Institute and circa 200m from St. Julians Primary School.



**Photo 2: Aerial view of the site outlined in red. Source: Google Maps, 2016**





**Photo 3:** Upper part of site along 'Triq il-Baltiku'. Source: ERA site visit, October 2019



**Photo 4:** Lower part of the site from 'Triq Mikiel Anton Vassallo'. Source: ERA site visit, October 2019

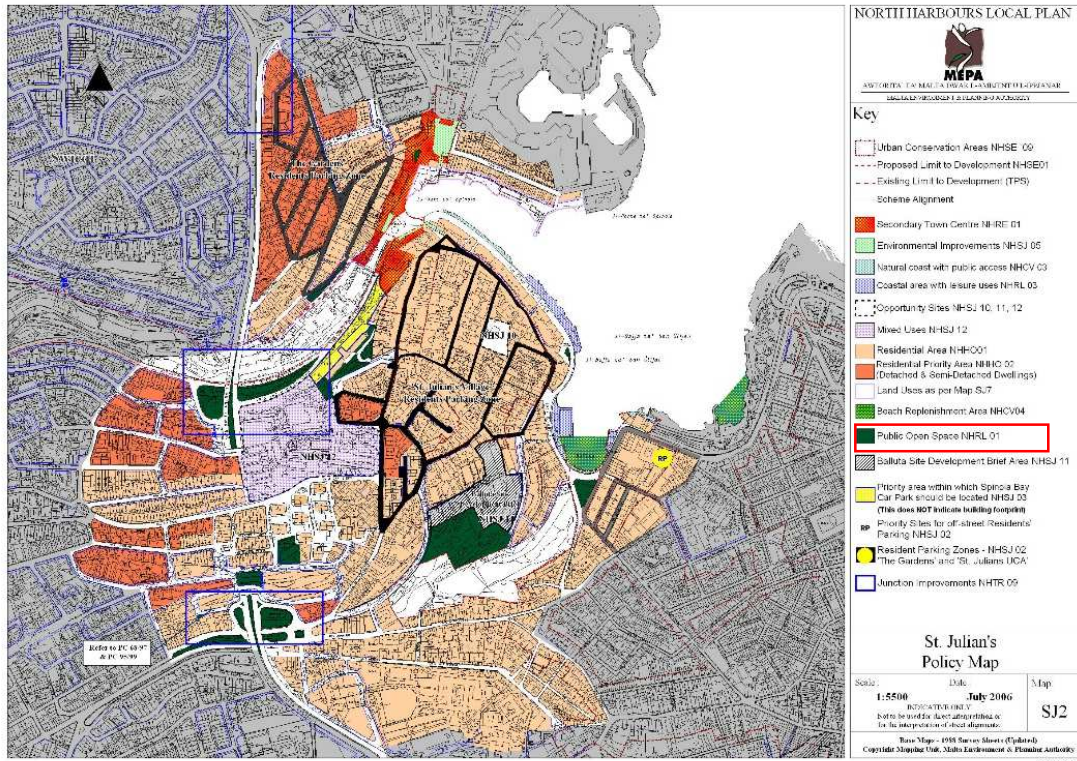


Figure 3: Map SJ2 of the NHLP, 2006 showing the limit to development and the public open space.

### 3. Site History

No previous planning permits which relate to the site in question were traced.

### 4. Documents used for screening:

1. Project Description Statement (PDS), referred to ERA on 17<sup>th</sup> October 2019.
2. ERA communication with applicant as per doc. 261a on eApps.
3. Plans in eApps – docs. 313b-e

### 5. Relevant EIA/screening criteria:

(citations refer to EIA Regulations, 2017 (S.L 549.46), except where otherwise specified):

The proposed development falls within the scope of Schedule I, Category II, Section 7.1.2.1 (*Projects which have: (ii) a gross floor area of 30,000m<sup>2</sup> of the Environmental Impact Assessment Regulations, 2017 (S.L. 549.46).*

### 6. Overall Assessment

- 6.1 The proposal will consume an undeveloped traffic island of circa 3,000sqm remnant of the works undertaken to construct the junction at Regional Road and presently functioning as a green lung. The North Harbours Local Plan Policy NHRL01 seeks to protect remaining public open spaces such as the site in question by preventing their development to other uses. The site, together

with the adjoining undeveloped green belt (also forming part of the public open space and wedged between the intersection), serve as a multipurpose buffer (air quality, ecological corridor, etc.) between the residential areas and the adjoining protected valley of Wied Ghomor which in itself is under threat from intensification of urban development. The thrust of the Strategic Plan for Environment and Planning, 2015 is to increase and improve such open spaces. The site is accessible to the public and appears to be used for informal recreation. The introduction of the proposed high-rise on the edge of the residential area beyond the boundaries established in the local plan will further contribute towards urban sprawl which would also increasingly dominate the underlying valley. A number of mature trees would also need to be uprooted to accommodate the proposed development.

- 6.2 The proposed development is expected to have potential significant impacts on the landscape and visual amenity of the area, including long-distance views given the site context and location. The proposed height and massing of the complex could potentially have implications on the building's impact on the wind climate within the complex at street level and near the site, and short-distance streetscape views. In the absence of an approved, holistic masterplan for the Paceville/St. Julian's area, these impacts are further compounded by similar, *ad hoc* development applications for high-rise buildings for which cumulative impacts on traffic flows, noise, air quality, landscape and visual amenity are also unknown. Moreover, the Local Plan delineations to maintain the site exclusively as an undeveloped zone appear to conflict with the proposal.
- 6.3 From the information provided in the PDS and the plans included in its Appendix, the project is likely to give rise to a number of other potential impacts, including: increased storm water runoff through impermeabilization of land; the generation of circa 10,000 m<sup>3</sup> of excavation waste during the excavation phase, and additional loading of the sewerage infrastructure. Such impacts may be significant in view of the scale, location, and nature of the proposed development.
- 6.4 In view that the site itself is used as a roundabout road junction, the proposal is expected to put additional traffic loads on the existing junction – 'Triq Mikiel Anton Vassalli' to 'Triq il-Baltiku'. However such aspect is best addressed in liaison with the relevant authority.
- 6.5 From the information provided in the PDS and the plans included in its Appendix, the project is likely to give rise to a number of potential impacts which do not fall within ERA's remit and would therefore need to be considered by the relevant authorities, amongst other considerations which need to be investigated further.

## **7. Conclusion and recommended way forward**

- 7.1 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. In this regard, the proposed development would require an EIA. However, the more 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 above.

### **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.