

PA/02454/19: Comments received by ERA during the EIA scoping stage (From 06 February 2020 to 7 March 2020)

A. Member of the public (Email dated 09 February 2020)

Comments

In line with the Eu Directive 2018/844 on energy performance of buildings, this supermarket must achieve a near zero energy status.

This means that it must have minimum energy consumption by applying building envelope energy efficiency measures and high efficiency energy services systems, as well as integrate renewable energy systems in its building envelope and in the surrounding area forming part of the property of the said building.

For example, hollow concrete blocks of the single or double density types are not sufficiently compliant with Technical Document F.

More details on near zero energy buildings and cost optimal studies for shops including supermarkets in Malta, visit [EU countries' 2018 cost-optimal reports - Energy European Commission](#)

B. Malta Resources Authority (Email dated 14 February 2020)

Comments

The MRA encourages the use of any excavated material, in so far as appropriate, as a resource and discourages the dumping of this material and its treatment as waste. In particular, the EIA should investigate the geology of the specific site (there is no need to include details on the structure of the lower globigerina formation in Gozo) and explain why 152,750m³ of excavated globigerina cannot be used, rather than treated as waste. The MRA has no other comments in so far as the functions under its immediate remit.

However, if the proposed development includes excavation works that reach partially or totally within the saturated zone, then the developer should submit an application in writing to the MRA including the details specified in regulation 5(1) of the Borehole drilling and excavation works within the saturated zone regulations (SL423.32).

The Authority also points out that the development lies within the groundwater protection zone.

This assessment is based primarily on the documentation that was published on the weblink provided as on the date of the assessment. The Authority made its assessment on a good faith basis and reserves the right to review its position and, or to take action against the authors of the documentation and, or the applicant if information relevant to its assessment (particularly the prior use of the site where the development is proposed) is 'buried' or concealed (including through the submission of documentation that is not text searchable).

This, and any other response in writing by the MRA to the application submitted for consultation or to any other documentation, should not in any way be deemed as approving or endorsing the application in any form or of condoning any matter that falls beyond the MRA's immediate remit as established under the Malta Resources Authority Act and as in force on the date of the relevant response. In particular, you are reminded that with the coming into force of the Act No. XXV of 2015 establishing the Regulator for Energy and Water Services, the Water Policy Framework Regulations and the Protection of Groundwater against Pollution and Deterioration Regulations have been excluded from the remit of Malta Resources Authority and as such the MRA has no authority to take a position on matters regulated by these regulations or indeed any other matter that does not fall within its remit. While this response may be published, any response by the MRA may not be publicly used or mentioned as a general or partial approval by the MRA of the matter referred to for consultation

C. Member of the public (Email dated 14 February 2020)

Comments

Re PA/02454/19 [EA/00065/19] Outline application to excavate three floors below existing level, and construction of basement level -3 garage for 380 cars, basement level -2 for storage in conjunction with Pama Supermarket and formation of underground link to existing Pama stores, basement level -1 retail class 4B, ground floor (road level) entrance lobby building and landscaped garden over development and new vehicular entrance to Pama Supermarket from Pantar Road. Site at, Triq Pantar, Mosta

Reference is made to public consultation in caption. I am hereby appealing to ERA/PA to conduct a social impact assessment (SIA) on this. You may find further information regarding SIAs in following link: <https://mikes-beat.blogspot.com/2019/05/feedback-re-social-impact-assessment.html>

D. Civil Protection Department (Email dated 14 February 2020)

Comments

With reference to your email, the applicant shall provide the fire safety report adhering to the relevant guidelines and standards. The Civil Protection Department will provide comments and feedback once the report is forwarded to the CPD.

E. Environmental Health Directorate (Email dated 20 February 2020)

Comments

With reference to your e-mail dated 6th February 2020 regarding subject in caption and following review of the Project Description Statement, please be informed that we would like to have the following issues related to public health included in the terms of reference for this proposed development:

1. Air pollution impacts assessment
 - For demolishing, excavation and construction
 - Emissions from heavy vehicles
 - Transports, storage and handling of construction materials
 - Operational traffic
 - And their effects on the surrounding area.
 - Necessary monitoring and mitigating measures must be clearly stated.
2. Noise and vibration impacts including construction activities, operational traffic and from other operational activities. Required monitoring and mitigating measures must be clearly stated.
3. Traffic Impact Study and Assessment regarding the consequence of this project that will have on the already heavy traffic in the vicinity of Pama Shopping complex effecting the areas of Mosta, Naxxar and Hal Lija. Mitigation measures are to be clearly stated.
4. Light pollution impact and mitigation measures.
5. A Waste Management Plan shall be implanted which should include the impacts from waste generated both during the construction (demolishing, excavated and construction material) and operation phase. Hence the importance of a detailed Construction and Waste Management Plan, which should be enforced by the site project manager. Details of monitoring and feedback mechanisms must be clearly stated and adhered to.
6. Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel and lubricants.
7. The overall cumulative impacts of the development on the general public.

8. Details of measures proposed to be taken to prevent nuisances at all stages of the project on the Area of Influence.
9. A hydrology assessment should be made available. Such assessment must include details for the supply, distribution and storage of potable water. Furthermore, it must include details of collection, storage, overflow and use of rainwater. Ground water and surface water in terms of water quality including run-off management.
10. Identify the source of ventilation of the underground parking and level of noise that it would generate. It must also cover the noise level that may have effect on the nearest private residence/ bedroom. WHO specifics, that the threshold level for noise exposure which may have a negative effect on the human health range is between 32-42dB.
11. Details of proposed sanitary facilities for workers
12. Pest control management on site and the surroundings.

The EIA should also include a detailed description of the measures envisaged to prevent, minimise and where possible offset any significant temporary or permanent adverse health effects and nuisances on the Area of Influence and the general public. This should include details regarding monitoring programmes that may be proposed. The EIA should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.

Applicants are also requested to carry out specific discussions with the Environmental Health Directorate once the detailed plans for the food outlets are prepared in view of specific regulations under the Food Safety Act.

F. Energy and Water Agency (Email dated 02 March 2020)

Comments

The following are comments for The Energy and Water Agency divided by considerations which relate to specifically and solely to energy and water management.

Energy:

- It could be beneficial to install a building management system (BMS) to better control the energy consumption within the facility and maximise on any potential energy savings.
- In the case of any external lighting installations, we would suggest looking into the use of solar-powered, and energy efficient lighting systems where applicable.
- For internal lighting installations, we would suggest looking into the use of solar tubes where applicable.
- Heat pump technology would be recommended for meeting any heating and cooling demands.
- We would recommend looking into the possibility of installing a photovoltaic system on the available roof space.

Water:

- Given that the site is located within a Groundwater Safeguard zone and is currently predominantly characterised by agricultural fields, the development will result in a reduction of recharge to the Malta main mean sea level groundwater body. It is recommended that as part of the EIA, wherever possible, mitigation measures are explored.
- The water demand of the development (50 m³/day) and the unquantified volume of irrigation water for the extensive soft landscaping proposed should be considered in the EIA so that sufficient water resources should be planned into the design of the development to cover the full water requirement of the development without the consideration of external water inputs such as trucked water supplies.
 - Landscaping should preferably respect the Mediterranean character of the Maltese Islands and be compatible with the surrounding environment by utilising native species of trees, shrubs and plants which do not require excess amounts of irrigation water. Water efficient irrigation systems should be included.

- All rooftop catchments and hard landscaping included in the design should be considered in the collection of rainwater run-off to be used in connection with irrigation, dual-flush toilets and other second class uses. Sufficient rainwater harvesting capacity should also be included in the design plans.
- The EIA should clearly define the amounts of water which will be utilised by the development and the source of water planned to satisfy the demand. It should also explore options to limit the sources of such water from natural groundwater resources.