

Environmental Impact Assessment

Screening

(According to Schedule IB of S.L. 549.46)

PA file no.: PA 6308/16

Other reference: EA 00002/17

Project Title: Construction of residential development as per policy NHSW08 of the North Harbours Local Plan; namely consisting in villas around the perimeter of the site (as per the same planning criteria and prevailing villa character of the area), quadruple units on the inner part of the site; retention of existing axial route; and provision of pedestrian routes.

Location: Site at (Land), Triq il-Madliena/ Triq Esprit Barthe/ Triq in-Nafra/ Triq il-Militar, Triq Il- Kajjarum, Madliena, Swieqi, Malta.

Screening date: February 2017

1. Description of Proposal

1.1 Outline of project/development

PA 6308/16 is an outline development application which seeks to develop the Central Madliena Opportunity Area as identified in the North Harbours Local Plan (Map SW5). This designation is governed by Policy NHSW08 which outlines the guidelines on the densities amongst other factors for development and Policy NHSW 09 respectively (see fig.1). The project will involve the construction of circa 70 detached villas around the perimeter of the site and quadruple units on the inner part of the site with the aim to respect the existing low density scenario. A plaza is also being proposed towards the centre of the site which will be retained as an open space with an existing fountain acting as the main landmark (see Fig.2). The North Harbour Local Plan designates specific convenience shopping areas having a maximum of five local shops within the Central Madliena Opportunity Site (refer to Policy NHSW08).

A number of other public open spaces are also being proposed. These will be accessed through the existing, axial linear route which will be updated to improve pedestrian connectivity.

1.2 Site description and related considerations

The site is located within the development zone of Swieqi and is accessed via 'Triq il-Madliena', 'Triq il-Militar' and 'Triq in-Nafra' (see Fig.3). The site has an approximate area of 49,230m² while the built up portion of the site covers a footprint of 11,192m². Presently the land is vacant and undeveloped, and is mainly used for agricultural purposes. The surrounding area is a low density residential area consisting mainly of detached and semi-detached villas.

The works are envisaged to be carried out in three phases (including subphases):

Phase 1: Soil removal, road and block formation, pedestrian access, on site storage, excavation of basements and construction of dwellings.

Phase 2: Construction of villas. Finishing of buildings externally and internally.

Phase 3: Formation of public open space through the restoration and construction of the central axis, plaza and cart ruts area.

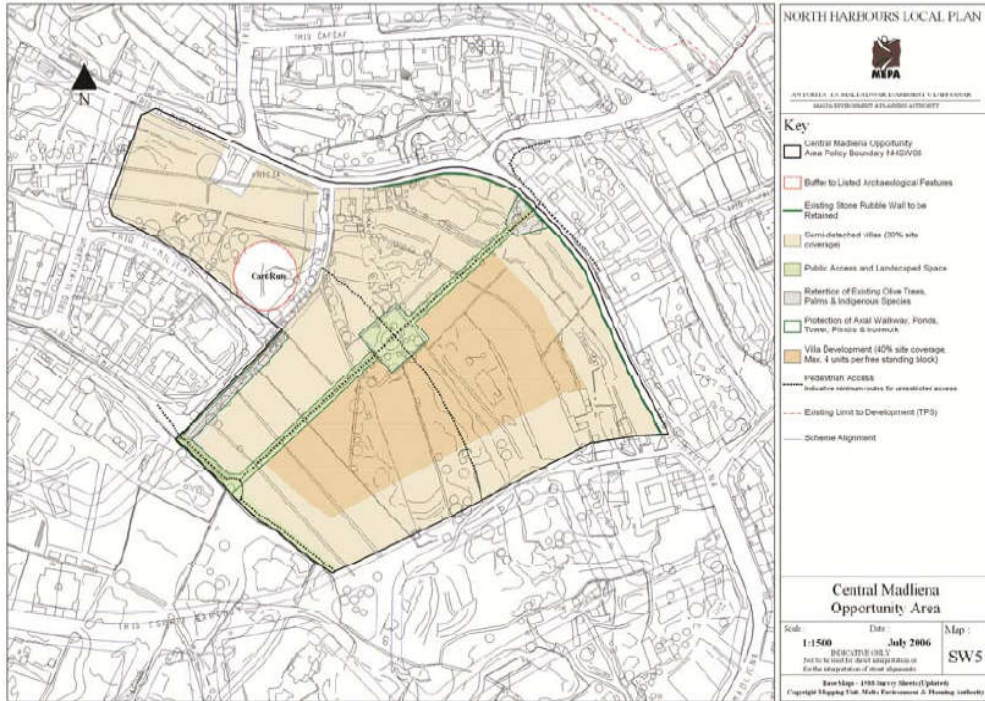


Figure 1: Central Madliena Opportunity Area - North Harbours Local Plan Map SW5



Figure 2: Proposed Masterplan and layout of residential units



Figure 3: 2016 aerial Image of site extent (outlined).

2. EIA-relevant history

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

Schedule IA, Category II, Section 3.1.2.1 (*Developments with a site area of more than 3 ha*) of the EIA Regulations, 2007 (S.L. 549.46).

2.2 Version of documents used for screening:

1. Project Description Statement (PDS) dated 16th December 2016 (PA 6308/16/5a/b/c) referred to ERA on 17th October 2016 (PA 6308/16/20).
2. Other relevant documentation in the case file for application PA 6308/16.

3. Screening Matrix

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|--|---|--------------------|
| 1 | Will construction, operation or decommissioning of the Project involve actions | Yes. The proposal lies within the development zone and has been identified as the Central Madliena Opportunity Area in accordance with | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged given that the proposal lies within a site designated for development. In this regard, any concerns with regards to land | PDS pg.8 |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|---|--|--------------------|
| | which will cause physical changes in the locality (topography, landuse, changes in water bodies, etc)? | Map SW5 of the North Harbours Local Plan. The current land use consists in of a tract of land which is currently vacant, undeveloped and subdivided in a number of agricultural land holdings, covering a site area of c. 49,230m ² . | uptake and land-use are best addressed directly through the development permitting process. | |
| 2 | Will construction or operation of the Project use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply? | <p>Yes. The proposal will require construction materials namely, concrete (49,200 cu m), stone (16,500sqm) and steel reinforcement (1,345,290 kg). Such resources are neither renewable nor in such short supply as to be markedly affected by this project per se.</p> <p>The project seeks to adopt an environmentally friendly approach through the use of solar energy for water heating and electricity generation. Water conservation and recycling of rainwater will be re-used in gardens and as second class water. A low energy light system is being proposed. Nevertheless, it is envisaged that fertile soil will be lost.</p> | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No. The use of such resources for this individual project <i>per se</i> is not likely to have a significant impact.</p> <p>The energy requirements of the proposals are expected to be minimal, thus no significant impact is envisaged.</p> <p>Given that the proposed development site mainly consists of agricultural land, soil which is a non-renewable resource will be lost.</p> <p>The applicant is committing himself to use the soil for the soft landscaping design of the project. Any unused soil is to be deposited at a site approved by the Department of Agriculture. In this instance, no significant impacts are envisaged.</p> | PDS pgs. 13 & 26. |
| 3 | Will the Project involve use, storage, transport, handling or production of substances or materials or energy, especially any resources which | Dust emissions may also occur during demolition, excavations and construction phases, which may have a temporary impact on the nearby residential dwellings, together with other emissions that would be generated by machinery during | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No considering the nature and scale of the proposal which is low density.</p> <p>Moreover, any possible impacts during construction may be sufficiently mitigated through the application of mitigation measures identified in the Environmental</p> | / |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|--|--|--------------------|
| | could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health? | construction. During operation, the proposal will increase operational traffic. | Management Construction Site Regulations (S.L.552.09) and through additional conditions to be included in the mainstream development process mechanism. Waste management during operation will consist in normal municipal waste generated by domestic uses. | |
| 4 | Will the Project produce solid wastes during construction, operation or decommissioning? | Yes. During construction, solid waste will be generated from excavation works, however given the scale and nature of the proposal the amounts are not likely to be significant. Waste generated during operation will consist in normal municipal waste generated by domestic uses. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No. Given the nature of the development, the amount of waste to be generated during construction and operation is not considered to be significant. The development should be in line with the Waste Management Plan for the Maltese Islands 2014-2020 particularly with Section 3.8.5 on Urban Design for Waste Management. | / |
| 5 | Will the project release pollutants or any hazardous, toxic or noxious substances to air? | Yes. During construction: temporary minor dust emissions from site clearance and excavation and NO _x from construction vehicles. During operation: NO _x from operational traffic to and from the residential dwellings. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No. During construction, emissions of dust and NO _x are temporary and can be sufficiently mitigated through the application of measures identified in the Environmental Management Construction Site Regulations (S.L.552.09). In this regard, the impact is not considered to be significant. During operation emissions from NO _x are not expected to be significant given that the proposal consists in the development of low density residential units. | / |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|---|---|--------------------|
| 6 | Will the Project cause noise and vibration or release of light, heat, energy or electromagnetic radiation? | <p>Yes. The construction phase is likely to give rise to noise and vibration affecting the residential area nearby.</p> <p>The operational phase and increase in traffic in the area may also contribute to an increase in noise.</p> | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No significant impacts are envisaged. During construction the applicant must:</p> <p>(i) Adopt mitigation measures that reduce noise emissions at source; and</p> <p>(ii) Comply with the requirements of the Environmental Management Construction Site Regulations (S.L. 552.09).</p> <p>Traffic induced noise emissions during operation are expected to increase from the existing baseline, however these are not considered to be significant given that the proposal consists in the development of low density residential units.</p> | PDS pg. 27 |
| 7 | Will the Project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea? | <p>Yes.</p> <p>During construction, the project may contribute to contaminated runoff from exposed vehicle access routes on the site, or runoff from the proposed landscaped area.</p> | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No. The proposal is not likely to lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea as long as the requirements of the Environmental Management Construction Site Regulations (S.L.552.09) are duly followed.</p> | |
| 8 | Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment? | <p>No increase in the risk of accidents is envisaged, other than 'normal' occupational risks typically associated with construction activity and commercial operation, including offices.</p> | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/></p> <p>No significant environmentally-relevant impacts are envisaged.</p> | / |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|--|--|--------------------|
| 9 | Will the Project result in social changes for example, in demography, traditional lifestyles, employment? | Yes, but only to a limited extent. The project will introduce approximately 70 new residential units within an already well-established development zone. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No. This increase in the number of residential dwellings will not have a significant impact on the surrounding locality which is also a residential zone. | / |
| 10 | Are there any such factors which should be considered such as the consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality? | No, such factors are known of. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No impacts are envisaged. | |
| 11 | Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project? | Yes. However, the area where the cart ruts and fountain are located will be retained as public open space to respect the buffer identified in the Local Plan (Central Madliena Opportunity Map SW5). | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No. The Superintendence of Cultural Heritage (SCH) noted that the proposed development will not affect the existing cultural features in view that these will be integrated in the design of the project. Nevertheless, the SCH acknowledged that other cultural heritage features may be uncovered during the execution of the project. Hence, the information requested by the SCH in its consultation reply should be taken on board (PA 06308/16/79a in PA file). Stones from rubble walls should be properly dismantled for reuse. | PDS pg.7 |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|---|--|---|--------------------|
| 12 | Are there any areas on or around the location which are important or sensitive for reasons of their ecology e.g. wetlands, watercourses or other water bodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project? | No such areas are known of, however within the whole extent of the site a number of mature trees, such as <i>Olea europea</i> can be found in an individual, sporadic fashion. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No. A number of old trees, mainly some olive tree specimens might be affected. In this regard, a tree survey might be necessary to determine which trees will be uprooted. This should be requested and processed through the mainstream development permitting mechanisms to safeguard the mentioned trees. | |
| 13 | Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project? | No such areas are known of, although there are a number of rubble walls enclosing the individual land parcels which provide a habitat for fauna and flora. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged. | PDS pg. 27 |
| 14 | Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the | No such areas are known of. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged. | / |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|---|--|---|--------------------|
| | project? | | | |
| 15 | Are there any areas or features of high landscape or scenic value on or around the location which could be effected by the project? | No such areas are known of. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged. | / |
| 16 | Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project? | No such areas are known of. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged. | / |
| 17 | Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project? | Yes. Triq Sant' Andrija, Swieqi, which is located at an approximate distance of 340sqm from the site experiences high levels of traffic and congestion as it is a major arterial road. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No the low density development and ancillary facilities will not contribute to further traffic congestion in Triq Sant' Andrija, Swieqi. | PDS pgs.8 & 27. |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|---|---|--------------------|
| 18 | Is the project in a location where it is likely to be highly visible to many people? | No. The site is not in a visually sensitive location or open countryside such as valley sides and escarpments. The Swieqi, Madliena and Ibragg areas are dominated by detached and semi-detached villas which follow design regulations and low density development as per North Harbour Local Plan. The remaining area is dominated by terraced houses and other terraced development. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged given the proposal's nature, scale and location within the Development Zone. The proposal is expected to close the wide open gap between the built plots along 'Triq il-Madliena'. | PDS pg.7 |
| 19 | Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project? | No such areas are known of although there are a number of rubble walls enclosing the individual land parcels. Rubble walls may host protected reptiles. Hedgehogs may also be breeding and foraging in the area. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> The heritage value of the existing rubble walls/dwarf walls has also been highlighted by the Superintendence of Cultural Heritage. This entity suggested the retention and incorporation of the existing dwarf walls surrounding the different field areas into the project (PA 06308/16/79a in PA file). Even though the area may harbour protected fauna, the proposal is not likely to have a significant effect given that such species will likely migrate to other areas nearby. | PDS pg. 7 |
| 20 | Is the project located in a previously undeveloped area where there will be loss of greenfield land? | No. The site lies within a committed development zone. Refer to Question 1. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> Reply to Question 1 refers. | PDS pg.8 |
| 21 | Are there existing land uses on or around the location e.g. homes, gardens, other | Yes. The site is situated within the built-up area of Swieqi/Madliena. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged since the proposal consists of low-density residential development on generally similar lines as already existing in the surrounding areas. | PDS pg.8 |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|---|--|--------------------|
| | private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project? | | Detailed considerations that may be relevant to the development under consideration are best addressed directly through the mainstream development permitting process. | |
| 22 | Are there any plans for future land uses on or around the location which could be affected by the project? | No such future uses are currently envisaged or known of. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged. | / |
| 23 | Are there any areas on or around the location which are densely populated or built up, which could be affected by the project? | Yes. The area surrounding the site (Swieqi/Madliena) is characterised primarily by residential uses; some ancillary, small-scale commercial premises, religious, community facilities, commercial outlets, and open space community facilities. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No. Given the scale and nature of the development, the proposal is not likely to have a significant effect on the surrounding locality. | / |
| 24 | Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities which | Reply to question 23 refers. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> Refer to reply to question 23. | / |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|--|---|---|--------------------|
| | could be affected by the project? | | | |
| 25 | Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project? | Reply to question 7 refers. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> Reply to question 7 refers. | / |
| 26 | Are there any areas on or around the location which have already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project? | Yes, the NO2 passive diffusive tube readings at 62 ug/m3 vs a limit of 40 ug/m3 measured along 'Triq Sant' Andrija' exceed the acceptable limits. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> The nature of the proposal i.e., low density residential development is not such that significant environmental impacts are envisaged as a result of this individual development per se. | / |
| 27 | Is the project location susceptible to earthquakes, or subsidence, landslides, erosion, flooding | No. | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unclear <input type="checkbox"/> No significant impacts are envisaged. | / |

| Question Number: | Questions to be Considered | Identified potential impacts Briefly describe | Is this likely to result in a significant effect? Briefly justify | Document reference |
|------------------|---|--|--|--------------------|
| | or extreme or adverse climatic conditions e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems? | | | |

4. EIA Screening Conclusion and recommended way forward

4.1 EIA screening conclusion

The above detailed EIA screening did not outline any significant negative impacts of the proposal to the point of warranting an EIA, as long as various mitigation measures are duly incorporated through the mainstream development consent mechanism and mitigated by means of conditions and specifications (e.g. approved documents) in the development permit.

In this regard, the proposal does not require the submission of an Environmental Planning Statement (EPS), and qualifies for the exemption process as per Regulation 3(8) of the EIA Regulations (S.L. 549.46). The applicant is expected to send the exemption request accordingly in order for this process to be initiated.

4.2 Submission of further information (directly through the mainstream permitting processes):

- A survey of existing trees on site, giving their scientific and vernacular name and supported by photographs, indicating which trees will be retained and which will be uprooted;
- Adequate provision for runoff management/harvesting and ancillary sewerage infrastructure needs to be factored into the development permitting process.

The following recommendations should be factored into the development consent process accordingly:

4.3 Recommended Permit Conditions

Waste management

1. Any soil on the site shall not be built over but shall be collected for reuse. A permit from the Director of Agriculture may be required to remove the soil from the site and to transport it to a different location. This condition does not exonerate the applicant, contractor or any other relevant party from complying with all permitting requirements as may be applicable for

deposition of the removed soil onto other land. Soil and material removed from the site shall not be deposited on any open or undeveloped land outside officially approved development zones, nor used for land reclamation, unless with prior approval in writing by ERA.

2. All operations concerning the management of waste are subject to all relevant regulations, including the Waste Regulations (S.L.549.63) and the Waste Management (Activity Registration) Regulations (S.L.549.45).
3. Inert waste material resulting from construction and excavation may be reused as fill material within the site as long as such reuse is in line with the approved plans and other conditions of this permit, or shall be deposited at facilities duly permitted by ERA and in accordance with the Waste Regulations (S.L.549.63) and the Waste Management (Activity Registration) Regulations (S.L.549.45).
4. Contaminated soils are to be managed and disposed of in accordance with the Waste Management Regulations (S.L.549.63) and Waste Management (Landfill) Regulations (S.L.549.29).
5. All wastes shall be separated according to the different waste streams as per EWC codes as defined in Commission Decision 2000/532/EC, and deposited in sites permitted by ERA to accept such wastes.
6. Any tarmac and asphalt resulting from excavation or demolition works shall be separated from all other wastes and deposited in sites permitted by ERA to accept such waste in accordance with the Waste Management Regulations (S.L.549.63) and the Waste Management (Activity Registration) Regulations (S.L.549.45).
7. Waste oils generated during the construction phase of the project must be stored in a secure leak proof container and may only be disposed of through a company duly authorised for the collection of waste oils or at an authorised site as per the legal provisions of the Waste Regulations (S.L.549.63).
8. All storage of machinery and/or waste oils required for or generated from the project shall take place only in locations where thorough clean-up and site reinstatement can be readily undertaken.
9. All stockpiles of waste material are to be positioned in such a way as to avoid contamination of air or water to through wind or runoff respectively.
10. Dust suppression equipment needs to be installed in stockpiling area.

Uprooting and Transplanting of Trees

1. Where possible, the uprooted trees should be transplanted in line with good arboricultural practices and in a period adequate for such works. In this regard, the applicant shall within a year from issuance of permit prior to commencement of works, submit a proposal for the transplanting for these trees subject to ERA approval.

Runoff and effluent management

1. No rainwater runoff, or wastewater other than sewage, shall be discharged into the sewer. Foul sewer drains must be strictly segregated from stormwater drains. The operator shall endeavour to collect rainwater in a suitable reservoir or cistern.
2. All measures shall be adopted to avoid pollution of the surrounding terrestrial environment,

including through the action of runoff from potentially contaminated areas.

3. Runoff from stockpiling area needs to be collected and/or intercepted so as to avoid contamination of any surface runoff.
4. No discharges to surface waters or groundwater shall take place at the installation.
5. Rainwater shall be segregated from all process areas that are potentially contaminated with raw materials, intermediates and/or products. If this is not possible, rainwater from areas where contamination by oil or fuel is likely (such as loading/unloading and banded areas) shall pass through an adequately sized interceptor.
6. All discharges to the foul sewer shall comply with the requirements of the Water Services Corporation Sewer Discharge Permit. Where requested by the WSC, effluent should pass through an adequately sized and well maintained interceptor.

External lighting

1. External lighting of the development shall be kept to a minimum and shall be appropriately shaded, and (except where indispensable for safety purposes) shall consist exclusively of low-key full cut-off down-lighters of low wattage in order to reduce light pollution. Globes and up-lighters are not allowed. Intruder-triggered switching shall be used wherever possible. Lighting of surrounding areas (including rural roads) beyond the operational precincts is strictly prohibited. The specifications in pg.13, Chapter 6 of the Project Description Statement should be adhered to.

4.4 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.