

**TRK 159681: PROPOSED FUEL SERVICE STATION, INCLUDING STORAGE AT BASEMENT LEVEL, CLASS 4B SHOP, TYRE SERVICE GARAGE, ATM AND CAR WASH FACILITIES AT GROUND FLOOR LEVEL**

**SITE AT, TRIQ BURMARRAD, BURMARRAD, SAN PAWL IL-BAĦAR, MALTA**

## **1. INTRODUCTION AND DESCRIPTION OF THE PROPOSED DEVELOPMENT**

The former Malta Environment and Planning Authority (MEPA) requested an Environmental Planning Statement (EPS) for the development proposed in permit application TRK 159681 (*Proposed fuel service station, including storage at basement level, class 4b shop, tyre service garage, ATM and car wash facilities at ground floor level at, Triq Burmarrad, Burmarrad, San Pawl il-Baħar, Malta*). The application required the submission of an EPS in accordance with Schedule IA, Category 7.6.2.6 (*Construction of a new fuel servicing station*) of the Environmental Impact Assessment Regulations, 2007 (S.L. 504.79). The EPS was coordinated by Dr. Joe A. Doublet.

### **1.1 Description of the proposed development**

The proposed development shall provide for the construction of a fuel station consisting of the following:

- Car wash and car drying areas;
- 24/7 pumping station selling diesel, unleaded and autogas (4 x 8 units (including 2 for autogas) + 1 x 2 high flow diesel dispenser);
- Air pump service;
- Tyre repair and replacement services;
- Car accessories and vehicle parts shop;
- LPG tank and dispenser;
- Electrical vehicle charging point;
- Vehicle servicing facility;
- Underground storage area;
- ATM facility;
- Restrooms; and
- Visitors' car park.

Lightweight canopies will cover the fuelling, the car wash and the drying areas. There will also be a number of structures which will be located underground. These include:

- Underground storage tanks (UST);
- Sedimentation tanks;
- Separator tanks;
- Water reservoirs and
- Storage area.

It is being proposed that the access to the fuel station refuelling area is from the main road *Triq Burmarrad* (Figure 89 of the EPS Coordinated Assessment). The site entry is separated from the exit point. There are no ramps to enter the site and all the parking spaces are located on the ground floor.

The proposed development site is currently consists in an abandoned field situated alongside an alley leading to a villa and a number of fields. The irregularly shaped site has an approximate area of 2,990m<sup>2</sup> with an approximate overlaying volume of soil of 1,570m<sup>3</sup>. In August 2015, an archaeological survey was undertaken on site in order to identify any remains in the affected area. Consequentially, the topsoil had to be removed and carted away to an approved site. All works were undertaken with approved permits from the relevant authorities and under the supervision of an archaeologist.

There are water, sewage and electrical services along *Triq Burmarrad*, which is the road leading to the proposal.

## **1.2 Assessment of alternatives**

With regards to the equipment to be installed on site, three different types of Underground Storage Tanks were considered:

- Double skin steel storage tanks;
- Single skin steel tanks; and
- Glass Reinforced plastic tanks (double or single skin).

The preferred option is the Class A Type D double skinned steel tanks complete with a Class 1 leak detection system to MSA EN13160 given that: (i) the interstitial space is monitored by means of a probe, which would detect any leakages either from the inside or the outside of the tank and therefore detected immediately; and (ii) steel tanks are of a much better material than glass reinforced tanks and they are less fragile especially during transport and handling.

Polyethylene pipes will be installed on site given that steel pipes would need a number of underground joints, thus increasing the possibility of a potential leak while glass reinforced plastic pipes are rather fragile and could create problems when connecting them to steel joints. Both Stage 1b and Stage 2 vapour recovery systems are a legal obligation as established through EU legislation. The fuel station will be equipped with both vapour recovery systems to reduce VOC emissions. Tables 4, 5 and 6 (Page 113-115) of the EPS Coordinated Assessment provide a summary of the alternative technologies and corresponding impacts.

With respect to the assessment of alternatives in terms of siting, the EPS notes that three site alternatives were taken into consideration. The sites considered are:

- (i) next to the water reservoir along *Triq Ħal Qormi, Ħal Luqa* which was not acceptable to the Malta Resources Authority (MRA) given the site's proximity to a borehole;
- (ii) *Ta' Qali* which was also not acceptable to MRA given its proximity to a borehole; and
- (iii) close to *St. Dorothy's School at Triq l-Imdina, Ħaż-Żebbuġ* where no agreement regarding the price was reached.

The zero option would imply that the site would remain in its present state, abandoned agricultural land used to cultivate animal fodder. Presently in *Burmarrad* there is an existing small diesel fuel station, while the closest station which offers unleaded fuel and a small car wash facility is situated at the entrance of *San Pawl il-Baħar* (along *Triq il-Mosta*). None of these stations offer gas filling services or electric charging points and are not equipped with modern vapour recovery equipment.

Two site layout alternatives were considered, in which (i) the first option would imply a slightly smaller shop located at the corner of the plot with four parking spaces in front of it and a drying area for four cars on the northern side of the plot, while (ii) the second option would have a smaller number of visitor's parking spaces than that under consideration and a much smaller shop with the car wash facility is next to the shop with the drying area located at the northern western corner of the plot both of which having four spaces available. It was concluded that the shop area is relatively too small to accommodate all functions, that is, a tyre service, an office and a shop while visual impacts from all layouts are similar to one another. The presented one was chosen due to the fact that it offers the best utilisation of land and quicker returns with lower levels of impacts resulting from tailbacks of cars pouring from the fuel station onto the street.

## **2. EIA CONSULTATIONS**

### **2.1 EIA Scoping**

During the scoping stage, the Project Description Statement (PDS) was circulated to the following consultees and made available for a 21-day public consultation period between 18<sup>th</sup> May and 8<sup>th</sup> June 2015:

- San Pawl il-Baħar Local Council;
- Malta Resources Authority (MRA);
- Ministry for Sustainable Development, the Environment and Climate Change;
- Malta Tourism Authority
- Transport Malta;
- Environmental Health Directorate;
- Superintendence of Cultural Heritage;
- Civil Protection Department;
- Environmental NGOs: Din l-Art Heġwa, Kummissjoni Ambjent, Birdlife Malta, Nature Trust Malta, Ramblers Association of Malta, Flimkien għal Ambjent Aħjar, Friends of the Earth Malta, Żminijietna, Fondazzjoni Wirt Artna, GAIA Foundation, Light Pollution Awareness Group, Moviment Graffiti, Malta Organic and Agriculture Movement, Malta Water Association, Youth for the Environment, Noise Abatement Society of Malta, Biological Conservation Research Foundation, Malta Bat Group, The Malta Ecological Foundation.

The PDS was also circulated for internal review within the former MEPA. Comments were received from Malta Resources Authority (e-mail dated 28<sup>th</sup> May 2015), Transport Malta (e-mail dated 18<sup>th</sup> May 2015), the Environmental Health Directorate (e-mail dated 3<sup>rd</sup> June 2015), Żminijietna (email dated 7<sup>th</sup> June 2015), and the Superintendence of Cultural Heritage (email dated 10<sup>th</sup> June 2015).

A copy of the comments as submitted are included as Appendix I to this report. The final Terms of Reference were issued to the applicant and architect on 10<sup>th</sup> June 2015, with amended versions issued on 12<sup>th</sup> June 2015 and 26<sup>th</sup> June 2015, respectively.

### **2.2 EIA Review**

The draft EPS was submitted to the former MEPA on the 5<sup>th</sup> January 2016 and was circulated for review to the same consultees consulted during the scoping stage (see Para 2.1 above) with the addition of the Agricultural Advisory Committee. The EPS was also circulated for internal review within the former MEPA.

Within the stipulated consultation period, comments were received from the Malta Resources Authority (e-mail dated 5<sup>th</sup> January 2016), Transport Malta (e-mail dated 8<sup>th</sup> January 2016), the Superintendence of Cultural Heritage (e-mail dated 12<sup>th</sup> January 2016), the Environmental Health Directorate (e-mail dated 27<sup>th</sup> January 2016), Resources for Energy & Water Services (e-mail dated 4<sup>th</sup> February 2016), and Din l-Art Heġwa (e-mail dated 5<sup>th</sup> February 2016).

Comments made by the former MEPA and its consultees during the review stage were forwarded to the EIA Coordinator, the developer and the architect on 15<sup>th</sup> February 2016. These comments were addressed by the EIA Coordinator and responses included in Appendix II to this report.

### **2.3 EIA Certification and Public Consultation**

The EPS was certified on the 14<sup>th</sup> March 2016 and was published for a three-week public consultation period, with a deadline for submissions being the 7<sup>th</sup> April 2016. No comments were received within the stipulated consultation period.

### 3. EIA FINDINGS

The characteristics of the site, assessment of impacts and mitigation measures identified in the EPS are as follows:

#### 3.1 Land use and Ancillary Considerations

The proposed site falls within an Area of Agricultural Value as described in the North West Local Plan. The site consists in an abandoned field which was originally used for the cultivation of animal fodder but is no longer being used in recent years. The site is overgrown with wild species and crops from previous years. The adjacent land-uses are mainly agricultural in nature with the only exceptions being that of a residential villa a few metres uphill along the entrance to the site. Two other residences are located about 200m south west of the proposed development and about 100m east of the development just across the road. A building which was used as a winery and is currently being demolished to make way for new development is located about 70m to the east of the proposed development site, while a cemetery is located about 50m to the north east, along Triq Burmarrad. The road leading to the proposed development is Triq Burmarrad which is used mainly by farmers to access their fields, residents in the villa just up the road, and also by Burmarrad Commercial who have an access from this road overlooking their premises located on Triq Burmarrad. A detailed plan illustrating the different land uses in the surroundings of the proposed development site is illustrated in Figure 15 (Page 131) of the EPS Coordinated Assessment.

##### 3.1.1 Impacts on Landuse

The EPS envisages that there will be a minor effect on the surrounding fields during the construction phase of the development. The retaining rubble walls will be dismantled and new rubble walls will be built again. This could result in a temporary loss of agricultural soil from neighbouring fields. The rubble walls will be rebuilt within a few weeks and the fields will be backfilled with the original soil, should there be a loss. In view of the fact that the potential impact on agricultural fields is of a temporary nature and should be very limited, the impact is being considered to be of *minor significance*. Should soils be washed away during the construction phase due to flash floods and site mismanagement, then impacts on the abovementioned fields could be *significant*, since most of the produce which would be on site would be washed away with the soil, and as a result the farmer would suffer significant losses.

Although the loss of agricultural land to the proposed project is permanent, given the estimated quantity of animal fodder produced from the proposed site is minor, the impact is considered to be of *minor significance*. Impact on the surrounding agricultural land during operation is also minimal, due to the fact that the vents will not be situated close to the agricultural fields but high up and distant (at the front end of the station) from the produce and therefore impact resulting from emissions on agricultural produce is considered to be *insignificant*.

#### PROPOSED MITIGATION MEASURES

- The vents of the Underground Storage Tanks (UST) will be placed at the front end of the fuel station, away from any landscaped or agricultural area. This will offset any potential impacts arising from the effect of fuel vapours on agricultural produce or other vegetation.
- Oil and fuel spills will be prevented from leaving the fuel station site by means of rows of gutters situated around the fuel dispensing areas which are connected to a forecourt Class 1 fuel separator in accordance with EN 858. The separator will also have maximum level alarms.

#### RESIDUAL IMPACTS

Given that the EPS has identified that the land use impact from the proposed development is *minor to insignificant*, no residual impacts are envisaged.

## **3.2 Geo-environment**

### **3.2.1 Geology**

The area of influence for the geology and geomorphological study extends to the boundary of the site since excavations for the proposed site will not be extensive. The EPS notes that the site for the proposed development is located in an area where the Middle Globigerina Limestone Mb is the exposed rock formation. Phosphate pebble bed or conglomerates mark the contact between the Lower and Middle Globigerina and the contact between the Middle and Upper Globigerina Limestone Members. All the three latter Globigerina Limestone members are present within the Area of Study. No Quaternary deposits were identified within the Area of Influence. Figure 38 (page 191) in the EPS Coordinated Assessment provides the geological map for the site in question and its surroundings, while Figure 39 (page 197) provides a geological cross-section across the study area.

In terms of structural geology, one fault traverses the Area of Study approximately 100 meters SE of the site striking NE-SW which runs parallel to the watercourse of Wied Qannotta. The EPS notes that the rock at the site has an intensely fractured nature possibly due to this fault. Strata appear to have a near horizontal attitude with a very low dip to the NE.

Whilst being an area with rock outcrop mostly covered by about 1m thick layer of topsoil, with gentle slopes and exhibiting no features that would suggest any potential instability, instability could arise during proposed excavations, due to exposure of rock wedges bounded by steeply dipping discontinuities. Additionally, it was concluded that the rock is marly and liable to shrinkage followed by the creation of shrinking cracks which increase in intensity with exposure turning the rock into rubble and jointed blocks causing rock falls into the excavation. However, the EPS states that such conclusion is determined by the monitoring of the walls of the excavation during the construction phase.

Two boreholes were drilled on 18 September 2015 to assess the quality of the stone material to be removed from site. Attempts to recover rock core samples failed due to the soft and weathered nature of the rock (marls of the Middle Globigerina Limestone) which as a result the Standard Penetration Test (SPT) in situ was carried out. Therefore, no suitable core samples were recovered and no laboratory testing was undertaken. There is no suitable use for the excavated rock given the rock is marly in nature with a relatively very low compressive strength.

Soils located on site area (Figure 50 – Page 215 - EPS Coordinated Assessment) belong to the San Biagio series developed on Middle Globigerina Limestone and are characterised by thick pale grey fine raw soils derived from the weathering of Middle Globigerina Limestone. Such soils are shallow to moderately deep, whitish, medium texture, with a weak subangular blocky structure. They are slightly decalcified with an A C R profile developed on calcareous parent material. On account of their favourable depth, texture, topography and areal extent these soils are well suited for mechanised agriculture.

### **3.2.2 Geomorphology**

The proposed site lies on the lower level of the Blue Clay - Globigerina Limestone sweeping slopes just above the Burmarrad Plain. Three distinct geomorphological features were identified in the Area of Study:

- A belt of gentle slopes sloping to the NE from Ġebel Ġhawżara in the south to Il-Wardija in the north interrupted by the deep valley of Wied Qannotta. The slopes start from the toe of Upper Coralline Limestone mesas and terminate at the Burmarrad plain;
- The Burmarrad Plain is a deep valley carved in Lower Globigerina Limestone and Lower Coralline Limestone during the last sea level retreat and buried during the last sea level rise; and

- Wied Qannotta a dry watercourse which discharges into the main watercourse of the Burmarrad Plain (Wied il- Għasel) and discharges at is-Salini a protected site (Natura 2000 site).

### **3.2.3 Hydrology and hydrogeological features**

The EPS notes that the area for the proposed development is underlain by the Middle Globigerina Limestone, which constitutes the mean sea level aquifer and lies outside the drinking water safeguard zone (Figure 51 – Page 216 – in the EPS Coordinated Assessment refers). The site is located on the side of the downstream segment of Wied il-Għasel, which drainage system has one of the largest catchments present in the Maltese Islands. The hydrological and hydrogeological features (refer to Figure 52 – Page 217) located close to the proposed site are as follows:

- Wied-Il-Għasel: a broad valley consisting mostly of agricultural land;
- Wied Qannotta a tributary of Wied il-Għasel;
- Diffuse discharge along the slopes of the upper and Middle Globigerina Limestone;
- Is-Salini a protected site and one of the few remaining salt marshes in the Maltese Islands; and
- Burmarrad Plain.

Given that there are no impermeable rock beds above sea level, there is no perched aquifer beneath the site. The only aquifer beneath the site that may be developed is the mean sea level aquifer, which in this case is represented by the Lower Globigerina Limestone underlain by Lower Coralline Limestone which lies some 20m below sea level (refer to Figure 53 – Page 218 - EPS Coordinated Assessment).

#### *IMPACT SIGNIFICANCE AND PREDICTIONS*

The EPS notes that impacts during construction will be similar to a normal building site with the use of relatively modest excavation and construction equipment especially given the existing rock is weak to very weak. As a result, the impact on geomorphology with regards to the degradation/destruction of subsurface solution cavern is considered as *High significance*. *Moderate significance* impacts during construction are likely to result in pollution through spillage of oil fuels, and stability of the existing walls during excavation. Spillages and leaking of the fuel tanks during operation will result in a *moderate significance* impact.

#### *PROPOSED MITIGATION MEASURES*

Mitigation measures as proposed by the EPS include:

- A concrete surface with special sealer in order to avoid any vertical seepage into the ground;
- Expansion joints will be incorporated in the design to avoid any unforeseen cracks in the ground;
- Two different separators, one for the forecourt and another one for the car wash area. These will collect most of the runoff waters and all the spills from both the forecourt and the car wash facility and retain the hydrocarbon fraction;
- Clean water from the roof of the building and the canopies will be collected in the appropriate water reservoir;
- Parts of the area will be dug up in order to accommodate the basement, fuel tanks, separators and sedimentation tanks. All structures which will be built following excavation will be rendered impermeable by means of concrete mixed with additives and geotextile material. The UST will be double skin type and have a monitored interstitial space in accordance to MSA EN13160. They will have a 15 year anti-corrosion guarantee and be covered with a special protective coating; and
- Filling and suction pipework installation shall be done in double-skin pipework in accordance with EN14125: 2004 complete with a Class 1 leak detection system as recommended by Association for Petroleum and Explosives Administration (APEA) and to MSA EN 13160.

#### *RESIDUAL IMPACTS*

With the implementation of the appropriate mitigation measures, residual impacts during construction are considered to be *minor to not significant* for the exception of the stability of the walls which will remain *moderate to very high significance* given its uncertainty. During operation, the residual impacts regarding spillages and leakages are still being considered as being of *very high significance*, given that residual hydrocarbons absorbed in soil or rock are very difficult to remove. However, the EPS states that the probability of occurrence is remote.

### **3.3 Cultural Heritage**

The cultural heritage study involved an archaeological investigation on the proposed site and was divided into two phases: (i) preliminary site investigation including the removal of vegetation, laying out of grids, compilation of site plan and photographic documentation; and (ii) removal of the surface soil by means of mechanical machinery to uncover any potential archaeological remains.

During the first phase, the only notable feature noted within the area of study was a World War II pillbox situated in an adjacent field and Roman remains, probably of a coastal nature at the Burnarrad cemetery, across the road from the proposal. No archaeological finds were noted during an inspection of the surface soil within the proposed site.

Two large uneven blocks of stone, with an underlying layer of hard white deposits and a few stones surrounding the latter possibly indicating the remains of an antique wall were found at the edge of the site butting the wall of the smaller field. Additionally, pieces of pottery were also found on site (Figure 57 of the EPS Coordinated Assessment). However, following detailed analysis, it was concluded that the large stones formed part of a rubble wall and that there were no archaeological remains on site.

#### *IMPACT SIGNIFICANCE AND PREDICTIONS*

The EPS indicates that there is a remote chance for any discoveries of any archaeological remains on site and is highly unlikely that any other remains are to be found at greater depths. However, during excavation and construction works, a *moderate significance* impact may result on the existing Pillbox which is located to the west of the site. No potential impacts on archaeological and cultural heritage are being envisaged during operation.

#### *PROPOSED MITIGATION MEASURES*

The EPS proposes that the area in proximity to the existing Pillbox needs to be propped up prior to commencement of excavation works in order to prevent unnecessary damage to the structure to ensure that the perimeter wall and soil found in the adjacent field are prevented from moving. Details of such works are being proposed to be submitted in the Construction Management Plan (CMP).

#### *RESIDUAL IMPACTS*

The EPS notes that the loss of features will result in a residual impact that ranges from *minor to not significant*.

### **3.4 Landscape and Visual Assessment**

The landscape assessment was based on a desk and a field survey. The visual amenity assessment was based on a desk study, the assessment of related viewpoints and a field survey methodology. The Zone of Visual Influence (ZVI) is illustrated in Figure 19 (Page 151) of the EPS Coordinated Assessment.

#### *GENERAL LANDSCAPE DESCRIPTION*

The proposed fuel station is located on Wied Qannotta (M12) basin (as illustrated in Figure 16 of the EPS Coordinated Assessment). Additionally, the relevant Landscape Character Areas which fall within the area of influence for the landscape assessment are the following:

- Wied Qannotta basin (M12);

- Magħtab (M14);
- Għargħur Valley (M21);
- West Mosta Hinterland (M23); and
- Mosta Naxxar (M24).

The proposal does not fall within an Area of High Landscape Value (AHLV) albeit it is surrounded by characteristic rural surroundings. The site is located on the outskirts of the rural hamlet of Burmarrad, consisting of a mix of elements which includes these associated with agricultural / rural setting mixings with urban elements and industrial elements dominating the landscape. Further North there is the urbanised *Buġibba* / St Paul's Bay area. The development site is located on the Wied Qannotta basin (M12) and the general landscape is bisected by a number of V-shaped valleys which support watercourses during the wettest season. The site and surrounding fields are along the slopes leading from the *Wardija* area down to the valley plains of *Burmarrad*.

#### VISUAL AMENITY

Six viewpoints (VPs) (Figure 19 – Page 151 – of the EPS Coordinated Assessment) were identified to assess the visual impact of the proposed development as follows:

- Viewpoint 1: *Dawret San Pawl, San Pawl il-Baħar*;
- Viewpoint 2: *Kennedy Drive, l/o San Pawl il-Baħar*;
- Viewpoint 3: *Triq Burmarrad, Burmarrad*;
- Viewpoint 4: *Triq tal-Imdawra, Burmarrad*;
- Viewpoint 5: *Triq id-Difiza Civili, Mosta*; and
- Viewpoint 6: *Triq il-Fortizza tal-Mosta, Mosta*.

#### IMPACT SIGNIFICANCE AND PREDICTIONS

##### *Impacts on landscape character*

In terms of landscape character, the EPS notes that the site is not located in an Area of High Landscape Value and the presence of new structures will only have a minimal effect on the landscape (*minor adverse impact significance*) from considerable distance. The overall landscape will be affected resulting in a *moderate adverse impact significance*.

##### *Impacts on visual amenity*

Impacts for each of the viewpoints analysed in the EPS are as follows:

Viewpoint	Location	During Construction	During Operation
1	<i>Dawret San Pawl, San Pawl il-Baħar.</i>	<i>Slight adverse significance</i>	<i>Slight adverse significance</i>
2	<i>Kennedy Drive, l/o San Pawl il-Baħar.</i>	<i>Slight adverse significance</i>	<i>Moderate adverse significance</i>
3	<i>Triq Burmarrad, Burmarrad.</i>	<i>Moderate adverse significance</i>	<i>Moderate adverse significance</i>
4	<i>Triq tal-Imdawra, Burmarrad.</i>	<i>Slight adverse significance</i>	<i>Moderate adverse significance</i>
5	<i>Triq id-Difiza Civili, Mosta.</i>	<i>Slight adverse significance</i>	<i>Slight adverse significance</i>
6	<i>Triq il-Fortizza tal-Mosta, Mosta.</i>	<i>Slight adverse significance</i>	<i>Slight adverse significance</i>

The EPS notes that the impact of the proposal on the visual amenity from the viewpoints ranges from *light adverse to moderate adverse*, with significance mainly dependent on the scale of change to the landscape and the visual amenity of the area and proximity to the site.

#### *PROPOSED MITIGATION MEASURES*

In terms of mitigation measures, in order to reduce the impact on the visual impact, a landscaping scheme (Site Plan 2 – Page 49 – of the EPS Coordinated Assessment) mainly limited to the northern part of the site is being proposed. Additionally, the positioning of the built structures together with the judicious use of colours should further reduce impacts on the landscape and visual amenity of the site.

#### *RESIDUAL IMPACTS*

The EPS indicates that the impacts from Viewpoints 3 (short-distance view) and 4 (southeast moderate-distance view) will remain (*Moderate adverse significance*) during operation.

### **3.5 Air Quality**

The air quality assessment carried out focuses on the potential impacts on air quality as a result of fuel delivery to the storage tanks on site and vehicle refuelling. Impacts on air quality arising during the construction phase are expected to be temporary and non-significant, given the construction period of four months and the adopting of good construction practices and mitigation measures as specified in the Environmental Management Construction Site Regulations, 2007 under L.N. 295 of 2007 (as amended by L.N. 358, 371 and L.N. 426 of 2007). In this regard, the assessment focused on benzene and odour emissions during the operational phase of the proposal.

As part of the Air Quality assessment, a baseline monitoring assessment of the benzene concentration on site was carried out. Results were obtained by direct measurement using diffusion tubes as well as an evaluation based on historical data from MEPA monitoring network. Measurements of benzene levels in the atmosphere on site were monitored using diffusion tubes in four points around the perimeter of the site and an additional central sampling point over a period of two weeks (Figure 65 – Page 231 – of the EPS Coordinated Assessment refers).

#### *BASELINE DATA*

##### *Benzene*

Data from MEPA's long-term diffusion tube network was used to establish a baseline indicating the current levels of benzene in the area. Annual average data for the year 2013 from MEPA's three stations located in Buġibba (BUB2 - Triq il-Makku; BUB5 - Triq it-Turisti; BUB6 - Triq il-Barrakki) were utilised, while diffusion tube data from another locality (Msida) was used for comparative purposes. The annual average data for 2013 (most recent and validated full year available) in Buġibba was calculated to be  $0.77\mu\text{g}/\text{m}^3$  while at Msida was of  $1.17\mu\text{g}/\text{m}^3$ ; well below the limit value of  $5\mu\text{g}/\text{m}^3$ . Following the air quality monitoring baseline survey performed on site using 5 diffusion tubes and applying the conversion factor (for annual average), the background value of Benzene at the site was estimated to be  $1.6\mu\text{g}/\text{m}^3$ .

##### *Odour*

Baseline odour levels were measured through a sniff test, which consisted of noting the odours experienced at the nearest sensitive receptors: (i) the Villa Farmhouse situated a few meters away from the site; and (ii) along Burmarrad Road specifically next to Burmarrad Commercials (Figure 66 in the EPS Coordinated Assessment refers). The sniff test was repeated at a fuel station which also possesses Stage IB and II vapour recovery systems, and thus a comparison was made between the baseline and the expected odours. The odour survey indicated a prevalence of "Auto Exhaust" and "Industrial" smells owing to the location situated in a busy main road and to the presence of Burmarrad Commercials and the number of small workshops working on tyres and cars.

#### *IMPACT SIGNIFICANCE AND PREDICTIONS*

In terms of benzene concentrations at the air sensitive receptor, the EPS predicts that with the development in place, this is likely to increase by  $0.22\mu\text{g}/\text{m}^3$  and thus notes that the impact is *negligible*.

With respect to odour, faint fuel odours were noted within the perimeter of the operational petrol station whilst the fuel station was in operation and servicing several vehicles simultaneously. These odours were no longer recorded within a 5 metre distance from the boundary of the station. The EPS expects that the proposal, which would be fitted with Stage IB and Stage II vapour recovery, would not lead to odour emissions that reach the nearest sensitive receptor. In this regard, impact on odour from the proposal is considered to be *not significant*.

#### *PROPOSED MITIGATION MEASURES*

Mitigation measures as proposed by the EPS include:

##### *Excavation and construction phase*

- Wetting of surfaces during excavation and construction phases;
- Reducing drop heights during loading of materials; and
- Material on trucks is to be covered during transportation.

##### *Operational Phase*

- Proposed station to be equipped with a Stage 1b and Stage 2 vapour recovery systems; and
- Workers are to also be supplied with protective clothing in order to avoid direct contact with the fuels.

#### *RESIDUAL IMPACTS*

Given that the EPS has identified that the air quality impact from the proposed development is *negligible*, no residual impacts are envisaged.

### **3.6 Environmental Risk Assessment**

The assessment focused on risks<sup>1</sup> arising from both the development and operational phases of the proposed development and included:

- Hazard identification;
- Identification of consequences;
- Estimation of the magnitude of consequences;
- Estimation of the probability of consequences;
- Evaluation of the significance of risk; and
- Risk management.

The proposal will include significant storage of petrol which is a mixture of various organic compounds (C4-C12) with properties that can give rise to fire, explosion, health and environmental hazards and liquid petroleum gas (LPG) which is also highly flammable. Both petrol and LPG can give rise to health problems and risks to the surrounding environment in absence of adequate controls.

#### *Risk Assessment and Management*

Risks with and without the management of the site was evaluated and assessed. Table 49 (Pages 381 – 402) of the EPS Coordinated Assessment provides the significance of risk for all the hazards identified for the proposed fuel station including a summary of the risk assessment and risk management.

The highest resultant risk levels without any mitigation measures are associated with the fuel dispensers and the underground storage tanks (UST). Fuel dispensers may have a high risk for car owners, workers, surrounding vegetation and soil on site through direct inhalation (for humans), absorption of vapours (for vegetation), and spillages/runoff (for soil) through vapour transportation. Should any leakages occur in the underground storage tanks, there is a high risk of product loss and dissolution in groundwater through the derogation of surface waters. With the appropriate mitigation measures in place, the resultant risk levels are minimised significantly. Appropriate mitigation measures include good management practices, signage, spill

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<sup>1</sup> Risk is being defined as a combination of the probability, or frequency, of occurrence of a defined hazard and the magnitude of the consequences of the occurrence. Hazard is being defined as a property or situation that in particular circumstances could lead to harm.

kits, double-skinned tanks, leak detection systems, Stage IB and Stage II vapour recovery systems, amongst others.

### **3.6 Cumulative Impacts**

In terms of cumulative impacts, the EPS note that there are at least seven applications:

- PA 00948/15 - demolition of the ex-winery to construct a commercial building;
- PA 06142/02 - construction of an agricultural store with an underlying reservoir;
- PA 06316/06 - construction of a poultry farm;
- PA 05272/10 - additions and alterations of Burmarrad cemetery;
- PA07237/05 - construct an opening in the wall of the field and place a timber;
- PA 01621/14 - transplanting of two cypress trees in order to construct a gate in an existing wall; and
- PA 00370/15 - to redevelop an existing store, restroom and reservoir in the immediate vicinity of the site.

The only applications which were granted permission and which could create cumulative impacts with the proposed Scheme are PA 00948/15, PA 06142/02, PA 01621/14 and PA 0370/15 all of which are found across the road from the proposed fuel station. All these structures would hide views of the proposal being assessed from Triq Tal-Imdawra.

#### **4. ENVIRONMENT RESOURCES AUTHORITY COMMENTS AND CONCLUSIONS**

The EPS has predicted a number of potential impacts on the environment as a result of the proposed development. Whilst the EPS proposes mitigation measures to minimise these impacts, it still identifies potential adverse residual impacts (that is, impacts that are still likely to prevail after all mitigation measures have been exhausted), particularly:

- i. Impacts on geo-environment, in terms of excavated waste, with no suitable use given its relatively very low compressive strength;
- ii. Stability of the walls which mitigation measures effectiveness remain uncertain;
- iii. Risks of spillages and leakages from the proposed petrol station, however the probability is considered as remote; and
- iv. Impacts on visual amenity from short and moderate distance views.

The Environment & Resources Authority (ERA) considers the proposal as unacceptable from an environmental point of view, given that the overall development/interventions will commit the entire site and introduce unnecessary and excessive formalisation, and uptake of land at the expense of undeveloped rural land. This also in the light that according to the hierarchy set out in the 'Fuel Service Stations Policy' Section 3.0, uncommitted sites should be the least favourably considered, especially when considering that more appropriate committed sites are available in the same catchment area.

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## **APPENDIX I:**

### **Comments received through EPS Scoping stage (18<sup>th</sup> May to 8<sup>th</sup> June 2015)**

#### **A. Malta Resources Authority (E-mail dated 28<sup>th</sup> May 2015)**

<b>Comments</b>	<b>EPD Comments</b>
<p>Please note the following comments are strictly on what was written in the PDS. It should NOT be interpreted that the MRA is disapproving the development. Land use permit is strictly MEPA's remit.</p> <p>Page 8. Line 3 and 4. It should be clarified as to what storage will be placed in the underground basement. There should be a distinction between the siting of the fuel storage tanks and oil separators which are "buried" in a pit lined with hydrocarbon proof geo-textile membrane.</p> <p>Page 15. First paragraph. The Authority does not agree that "there is a shortage of fuel stations" since at present there are 79 active petroleum filling stations. One must not consider the number of stations but the number of dispensing nozzles in the station.</p> <p>Page 15. Second paragraph. The owner of the small fuel station located 670m due South in Burmarrad has a pending application for a larger petrol station in the vicinity. See PA 2335/07. Moreover there are 3 other petrol stations at the entrance to St. Paul's Bay not just one as incorrectly stated.</p> <p>Page 17. The existing petroleum filling stations are bound to upgrade their stations by 2020. So "the need for further stations which should have the necessary standards in order to abide by the current EU directives" is already being addressed.</p> <p>Paragraph 5.2.2 and 5.2.2.1 The equipment to be used in this petroleum filling station has to be according to standards set by the Authority. The Authority has already vetted the technical proposal drawn up by the competent person and has given a clearance to the use of this equipment. The same can be said for the operations that would be carried out at the station.</p> <p>Paragraph 5.2.3 The station layout should be the one approved by the Authority in the clearance document dated 4th December 2014 and passed on to the applicant. Any changes in the layout should be approved by the Authority beforehand as also stated in the conditions issued with the clearance given.</p> <p>Regarding the groundwater issues there are no further comments since the site is not within the groundwater protection zone. However please note that within an approx. 2km distance one already finds 4 petrol stations (please refer to the attached site plan).</p>	<p>Noted; no further comments.</p>



**B. Transport Malta (E-mail dated 18<sup>th</sup> May 2015)**

Comments	EPD Comments
A Traffic Impact Statement has been submitted in support of this proposal and this is addressing any issues Transport Malta may have. Therefore, there is nothing specific that Transport Malta needs included in the terms of reference of the Environmental Planning Statement.	Noted; no further comments.

**C. Environmental Health Directorate (E-mail dated 3<sup>rd</sup> June 2015)**

Comments	EPD Comments
<p>With reference to your e-mail dated 18 May 2015 regarding subject indicated 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 :</p> <ol style="list-style-type: none"> <li>1. Air pollution especially from particulate matter during the site clearance/excavation and construction stage, from engine exhaust, traffic generated pollution and emissions of VOCs during the operation stage and their effects on the Area of Influence, the general public and on the environment.</li> <li>2. Noise, odour (during the operation phase) and vibration impacts.</li> <li>3. Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site.</li> <li>4. Waste management and disposal issues for all generated waste streams.</li> <li>5. Traffic management and related problems and access arrangements including safety measures.</li> <li>6. Mitigation measures regarding aquatic sources in terms of water quality including runoff management.</li> <li>7. Adverse impacts caused by potential accidental spillage of hazardous fluids, fuel and lubricants.</li> <li>8. Potential adverse public health impacts during the construction and operational stages.</li> <li>9. Description of the hazards associated with the development. These should take into consideration health and safety and emergency measures.</li> </ol>	<p>Issues related to air quality and emissions during construction and operation, spillages, waste management, traffic management, impacts on air quality, odours, risk assessment and cumulative impacts have been included in the TORs for the proposed development.</p>

<p>10. Assessment of the overall cumulative impacts of the development on receptors in the area and on the general public.</p> <p>11. The VOCs vapour recovery unit which is to be installed in line with the relevant Directive prior to the start of operation of the proposed petrol station.</p> <p>The EPS should also include a detailed description of the measures envisaged to prevent, minimize and where possible offset any significant adverse health effects on sensitive receptors in the Area of Influence and on the general public. This should include details of monitoring programmes that may be proposed. The EPS should also identify, describe and discuss in detail the possible health effects of any residual impacts that cannot be mitigated.</p>	
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**D. Žminijetna (E-mail dated 7<sup>th</sup> June 2015)**

<b>Comments</b>	<b>EPD Comments</b>
<p>The locality is already equipped with two petrol stations, on the road to St Paul's Bay. The land proposed for development and the surrounding area is mainly agricultural land, except for the few residents and commercial buildings in the vicinity. The site lies also within the Burmarrad water catchment area.</p> <p>"The only outline applications permitted in this area were mainly those related to agricultural use", Zminijetna points out.</p>	<p>Noted; no further comments.</p>

**E. Superintendence of Cultural Heritage (E-mails dated 10<sup>th</sup> June 2015)**

<b>Comments</b>	<b>EPD Comments</b>
<ol style="list-style-type: none"> <li>1. The archaeological excavation is to be carried out by one archaeologist as site coordinator to constantly monitor Phase 2, and under the direction of the Superintendence of Cultural Heritage. The archaeologist is to be chosen from the list of archaeology monitors due to the necessary skills to coordinate works carried out by mechanical machinery.</li> <li>2. The developer is to inform the Superintendence in writing with the choice of monitor.</li> <li>3. The archaeological site excavation (Phases 1 and 2) is to be carried out within four weeks. An extension to the four week deadline to ensure the completion of the archaeological excavation will be considered by the Superintendence following the site coordinator's request. The timeframe for Phases 3 and 4 will be determined after Phases 1 and 2 are completed.</li> <li>4. The site coordinator is to submit to the Superintendence a programme of works for Phases 1 and 2 of this archaeological excavation. A programme of works for Phase 3 of this archaeological excavation will be required following termination of Phase 2 and in case of archaeological discoveries.</li> <li>5. The archaeological excavation must be carried out according to the following phases: Phase 1 – Preliminary site investigation</li> <li>6. This phase includes the site preparation for the excavation including clearances from any vegetation and modern dumping, the laying out of grids, field walking, the compilation of a general site plan together with the sea levels and photographic documentation before excavation. A preliminary report is required at end of Phase 1.</li> <li>Phase 2 – Archaeological Excavation (monitored removal of topsoil)</li> <li>7. This phase includes the removal of topsoil by means of mechanical machinery to uncover any archaeological remains. Soil clearance is to be carried out in an adequate manner which permits the identification of cultural heritage remains. A progress report or discovery report (in case of discovery is required) at end of</li> </ol>	<p>Impacts on cultural heritage were included as part of the Terms of Reference for the EPS.</p>

<p>Phase 2.</p> <p>8. The soil is to remain stored on site for possible reinstatement once the investigation is deemed completed by the Superintendence.</p> <p>Phase 3 – Archaeological Excavation &amp; Documentation</p> <p>9. This phase includes the stratigraphic excavation of the archaeological remains, the written documentation, drawing documentation and photographic documentation of the excavation and the archaeological remains.</p> <p>Phase 4 – Post-Excavation and Report Writing</p> <p>10. This phase includes the processing of the data, material cultural, archaeological remains and objects, and the submission of the final archaeology report. The timeframe for this phase will be determined after Phases 3 is completed.</p> <p>11. The archaeological excavation must be undertaken in accordance to the Superintendence Terms of References, 'Operating Procedures and Standards for Archaeology Services' and the Cultural Heritage Act.</p> <p>12. Authorisation for the start of this archaeological investigation together with the issue of the Terms of Reference will be issued following submission of any requested information above (clause 1 – name of archaeologist, and clause 3 – programme of works).</p>	
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## APPENDIX II:

### Comments received through EPS Review period (5<sup>th</sup> January – 5<sup>th</sup> February 2016)

#### A. Malta Resources Authority (Email dated 5<sup>th</sup> January 2016)

Comments	Dr. Response	Doublet	EPD Comments
It is important to note that with the coming in force of Act XXV of 2015 (setting up of the Regulator for Energy and Water Services) the responsibility for Groundwater protection etc was transferred to MEPA. The MRA does not have the remit and or responsibility for groundwater protection.	Noted		Noted.

#### B. Transport Malta (Email dated 8<sup>th</sup> January 2016)

Comments	Dr. Response	Doublet	EPD Comments
Transport Malta has no comments to make regarding this EPS and no objection to it being made public.	Noted		Noted.

#### C. Superintendence of Cultural Heritage (E-mail dated 12<sup>th</sup> January 2016)

Comments	Dr. Response	Doublet	EPD Comments
The Superintendence has no objection to the Environment Planning Statement being made public.	Noted		Noted.

#### D. Environment Health Directorate (Email dated 27<sup>th</sup> January 2016)

Comments	Dr. Response	Doublet	EPD Comments
<p>Applicant is to adopt best practice methods together with good site practices and ensure compliance with Environmental Management Construction Site Regulations during the excavation and construction phase. Moreover applicant is to implement all proposed mitigation measures so as to cause least nuisance and mitigate adverse air (from dust dispersal and emissions from vehicles and machinery), noise and vibration impacts on sensitive receptors in the Area of Influence and on the general public. Hence the importance of drawing up and implementation of a Construction Management Plan to ensure adherence to proper site management practices so as to address groundwater and surface water pollution, to mitigate other adverse construction impacts, including construction traffic impacts and to ensure safety measures. Monitoring of construction works is also highly recommended so as to ensure implementation of all necessary mitigation measures and adherence to work practices throughout all the phases of the project.</p> <p>Safe and proper handling of raw materials on site should also be ensured. Adequate preventive measures are to be taken regarding the potential accidental spillage of hazardous fluids, fuel and lubricants which are also to be well managed and adequately stored.</p> <p>To avoid potential risks of contamination of aquifer and in change of quality of surface water run-off, it is pertinent that all proposed mitigation measures highlighted in the EPS are strictly implemented. Monitoring to ensure that all mitigation measures taken by the developer are effective in preventing any possible negative impacts from this development on the underground water supplies is recommended.</p>	Noted		Noted.

<p>With regards to air (benzene and odour) emissions during the operation phase it is pertinent that the proposed vapour recovery systems (Stage IB and Stage II recovery) be installed in line with the relevant legislation so as to mitigate adverse impacts on sensitive receptors in the area. Moreover, the vapour recovery systems should be maintained regularly to ensure their effectiveness in abating emissions and odours.</p> <p>Adequate measures are also to be taken to ensure that surface run-off, water used for dust control, water used for wheel washing and general cleaning and water from the car wash facility be strictly managed and properly channelled and do not run off the site.</p> <p>It is also pertinent that during the operation of the scheme all proposed mitigation measures are strictly implemented so as to mitigate all environmental risks especially through underground, surface and airborne pollution.</p> <p>A Waste management strategy should be adopted and implemented during the excavation/ construction and operational phases so that all generated waste streams will be contained, separated and disposed of safely through the appropriate facilities and according to the necessary permits/licences. With regards to removal and disposal of any hazardous waste, adherence to regulatory codes and procedures and due diligence is important in view of the health and safety and any adverse impacts on nearby sensitive receptors.</p> <p>Generated wastes, cleaning chemicals, etc. from any temporary sanitary facilities for on-site workers should be properly disposed of. Moreover all water for human consumption and personal use at said facilities is to be adequate, potable and from an approved source (preferably from the Water Utility Supply i.e. Water Services Corporation).</p> <p>Reservoir-harvested rain water and recycled water from car wash system should not to be used for human consumption and/or personal use.</p> <p>The general service garage and the storage area at basement level are to be adequately ventilated.</p> <p>The proposal that light dispersion will be controlled so as to avoid undesirable pollution effects on the neighbouring environment is highly recommended.</p> <p>It is recommended that construction traffic follows established specific routes and adequate site management together with other measures such as covering of all trucks leaving site with proper tarpaulin sheets are taken to mitigate adverse dust impacts and nuisances from heavy vehicles during transportation. All other mitigation measures which may be necessary to minimise nuisances and adverse health impacts from construction traffic are to be implemented.</p> <p>It is highly recommended that all proposed mitigation measures regarding adverse impacts arising from this development are to be implemented by applicant to mitigate any significant adverse health effects and nuisances on sensitive receptors in the Area of Influence and the general public. The possible health effects of any residual impacts that cannot be mitigated should also be taken into consideration.</p> <p>Moreover any other unpredicted impacts and nuisances which may arise from this development and that may have a significant adverse effect on public health are to be immediately addressed by the applicant and the necessary mitigation measures taken.</p> <p>The proposed monitoring programme for all the phases of the development and during the following years is also highly recommended.</p> <p>Complaints lodged by the public regarding any adverse impacts/nuisances should be immediately addressed by the applicant. All complaints lodged</p>		
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<p>and actions taken are to be recorded and such records are to be readily available to the Competent Authorities when requested.</p> <p>A pollution incident control plan should also be in place. Records of all pollution incidents, especially regarding potential pollution of the surrounding environment, are also to be kept and reported to the respective authorities accordingly.</p> <p>Regarding any future plans for Scheme decommissioning, the procedures highlighted in EPS are recommended to be followed.</p>		
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**E. Resources for Energy & Water Services (E-mail dated 4<sup>th</sup> February 2016)**

<b>Comments</b>	<b>Dr. Doublet Response</b>	<b>EPD Comments</b>
<p><b>Clearance letter issued by Malta Resources Authority for the design of a Petroleum-filling Station under S.L. 423.37 'Petroleum for the Inland (Retail) Fuel Market Regulations'</b></p> <p>The Malta Resources Authority (MRA) refers to the final design proposal for a petroleum-filling station (PFS) submitted by the Competent Person Ing Victor Bonello of B.Nel Engineering Consultancy on your behalf and dated 19th November 2014.</p> <p>It must be stated that his clearance letter should not in any way be deemed as approving or condoning any matters beyond the MRA's immediate remit. This clearance letter may not be publicly used or mentioned as a general or partial approval by the said MRA.</p> <p>The MRA received technical reports and drawings showing the design and operation of the proposed PFS and Autogas Dispensing Station (ADS). The documents were reviewed by MRA analysts and consultation meetings were held with the competent person.</p> <p>The final reports and drawings that were submitted on the 1st December 2014 and are as follows:</p> <p>Technical Report (VB/me/R3073/14/r1) dated 01/12/2014 which is a 16-page document on the design and operation of the PFS in general.</p> <p>Technical Proposal Supporting Document dated 01/12/2014 which is the standard checklist issued by the Authority and filled in by the competent person.</p> <p>Water Conservation Report (VB/memR3078/14 dated 01/12/2014</p> <p>Drawing JT/BMR/FC-01 Foreourt layout dated 17/11/2014  Drawing JT/BMR/TF-01 Tank Farm Layout dated 17/11/2014  Drawing JT/BMR/FB-01 Filling Pipe-work dated 17/11/2014  Drawing JT/BMR/SP-01 Suction pipe-work layout dated 17/11/2014  Drawing JT/BMR/AV-01 Air Vent Pipe-work layout dated 17/11/2014  Drawing JT/BMR/SL-01 Sleeved layout dated 17/11/2014  Drawing JT/BMR/DL-01 Drainage layout dated 17/11/2014  Drawing JT/BMR/WS-01 Warning Signs layout dated 17/11/2014  Drawing JT/BMR/HZ-01 Hazard Zone Classification dated 17/11/2014  Drawing JT/BMR/LPG-01 LPG layout dated 26/11/2014  Drawing JT/BMR/FH-01 Fire Hydrant layout dated 17/11/2014  Drawing SP/JT/BMR01 Site plan.</p> <p>The 'Technical Proposal Supporting Document for the Design / Material Alteration of A Petroleum-Filling Station', the technical report(s), and all the</p>	Noted	Noted.

<p>drawings are being countersigned by the MRA for identification and are to be considered as an integral part of this clearance letter. In the case of a conflict among the documents presented, the 'Technical Proposal Supporting Document for the Design / Material Alteration of A Petroleum-Filling Station', shall prevail over the technical report(s), and the details of the technical report(s) shall prevail over the detailed of the drawing(s).</p> <p>The water issues for the carwash have been reviewed from the point of view of groundwater protection. It is noted that the development site at Burnmarrad is not located within the groundwater protection zone.</p> <p>The MRA is therefore giving clearance on the car wash subject to the conditions outlined hereunder:</p> <p>The MRA finds no objection to the design and eventual construction of this proposed PFS and ADS as indicated, provided that it shall be constructed according to the above drawings and reports. Once this proposed installation is complete, duly commissioned and certified by a Competent Person in petroleum-filling stations, the Authority will eventually be in a position to consider the issue of the necessary MRA authorisation for the operation of the same petroleum-filling station provided that:</p> <ol style="list-style-type: none"> <li>1. All information associated with this proposal has been submitted to the MRA in a bona-fide manner;</li> <li>2. there are no deviations in the construction of the petroleum filling station (unless otherwise approved in writing beforehand by the MRA) from the MRA-countersigned Technical Proposal Supporting Document, the technical reports and the drawings;</li> <li>3. The applicant is the holder of an compliant with all other relevant permits and, or authorizations however so described, issued by any other public authority or Government Department</li> <li>4. The development and its desired operation is compliant with the relevant legislation and, or regulations and, or policies in force at that time;</li> <li>5. Any other requirements including the payment of the relevant fees to the Authority are complied with to the satisfaction of the MRA</li> </ol> <p>This clearance is valid for sixty (60) months from the date of issue. Kindly keep the Authority informed on the progress of the application to MEPA by supplying the tracking number and the PA number when issued. A copy of the final MEPA development permit would be required prior to the commencement of construction of the petroleum filling station.</p>		
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**F. Din I-Art Helwa (E-mail dated 5<sup>th</sup> February 2016)**

<b>Comments</b>	<b>Dr. Doublet Response</b>	<b>EPD Comments</b>
<p>Din I-Art Helwa has reviewed the EPS submitted with reference to this application and hereby submits its feedback about this application and the content discussed in the EPS.</p> <p>This application concerns the proposal for a new petrol station on a site area of 2900m<sup>2</sup>. This application does not refer to a relocation of an existing service station within an urban context but the creation of a new license. DLH disagrees with the uptake of virgin land within ODZ areas for the construction of fuel service stations, and even more so in this case for the creation of a new licensed petrol station. Besides the uptake of virgin land this application will also include the dismantling of rubble walls.</p> <p>The site is located within an Area of Agricultural Value as described in the North West Local plan. DLH acknowledges that there are several commitments along this stretch of the road, however this reinforces the need to retain some open areas. This development would extend the commercial</p>	<p>Noted</p>	<p>Noted.</p>

<p>area further, and result in a loss of ODZ land as well as a loss of visual access onto the agricultural areas which lie behind the site on an important traffic route, detracting from the agricultural character of the area.</p> <p>Section 1.3 of the EPS describes a “shortage of modern fuel stations in the location and cater for the demand of fuel...” This comment is definitely in contrast to the statistics quoted in the same documents which state that in 2013, 85 renewed licenses for fuel service stations existed in Malta. The distances that one needs to travel to the nearest petrol station are very short and the need for another fuel station is not realistic or objective.</p> <p>The proposal would also include a class 4b store, tyre service garage, ATM and car-washing facilities. It would also provide LPG refuelling station and a charging bay for electric cars. The project also includes 3 canopies which vary in height from 4.2m to 5.75m.</p> <p>The project offers very poor landscaping, and the single row of trees does not screen the Petrol station as seen from Dawret San Pawl and the adjacent fields.</p> <p>DLH objects to this application for following reasons:</p> <ul style="list-style-type: none"><li>• The loss of 2900m<sup>2</sup> to a commercial activity located within ODZ.</li><li>• The great negative visual impact to be incurred on this road which is still a predominantly agricultural landscape. The proposed development will further urbanise the character of the area.</li><li>• Increase in various forms of pollution and the possible risk of contamination to the groundwater</li><li>• Similar facilities exist in close proximity and the loss of ODZ land is not justified.</li></ul>		
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