

ERA Ref.: EA/00021/20

PA Ref: PA/01123/20

Description Proposal: Construction of St. Albert the Great Community College, Class 2C; consisting of four blocks above ground: Kinder/Administration block, Early and Middle school block, Senior school block and Child care block, including also external sports facilities and educational horticultural spaces, and underlying car parking (two levels), auditorium, indoor sport facilities, and water reservoirs.

Location: Site at, Dawret Hal Ghaxaq c/w Triq il-Hareb c/w Unnamed Alley, Il-Hareb, Ghaxaq

Subject: Table with recommendations and ancillary reasoned justifications provided by the public, government entities, E-NGOs and relevant local councils, during 30-day public consultation on Terms of Reference, on any matters that they wish to see included in the EIA terms of reference.

Consultation period: 2nd June 2021 – 1st July 2021

No.	From	Comment
1	Civil Protection Department (email dated 2 June 2021)	The Civil Protection Department request that the fire safety report for the project shall be prepared. The project's entrusted fire safety competent engineer shall ensure that the development is adhering to the relevant fire safety standards and include the access and facilities for the fire service. Same report shall include the evacuation and emergency plan for the entire project. The project's applicant and architect should be made aware that once the project is finalised, the fire safety compliance adhering to the relevant standards should follow before the College is operating.
2	Environment Health Directorate (email dated 14 June 2021)	With reference to your e-mail dated 2nd June 2021 regarding subject in caption and following review of the Project Description Statement, please be informed that we would like to have the following issues related to public health included in the terms of reference for this proposed development: <ol style="list-style-type: none"> 1. Air pollution impacts assessment <ul style="list-style-type: none"> • For demolishing, excavation and construction • Emissions from heavy vehicles • Transports, storage and handling of construction materials • Operational traffic

		<ul style="list-style-type: none"> • And their effects on the surrounding area. • Necessary monitoring and mitigating measures must be clearly stated. <p>2. Noise and vibration impacts including construction activities, operational traffic and from other operational activities. Required monitoring and mitigating measures must be clearly stated</p> <p>3. Traffic Impact Assessment and mitigation measures.</p> <p>4. Light pollution impact and mitigation measures.</p> <p>5. A Waste Management Plan shall be implanted which should include the impacts from waste generated both during the construction (demolishing, excavated and construction material) and operation phase. Hence the importance of a detailed Construction and Waste Management Plan, which should be enforced by the site project manager. Details of monitoring and feedback mechanisms must be clearly stated and adhered to.</p> <p>6. Adverse impacts caused by unsafe, inadequate storage and improper handling of raw materials on site and from potential accidental spillage of hazardous fluids, fuel and lubricants during construction phase.</p> <p>7. The overall cumulative impacts of the development on the general public.</p> <p>8. Details of measures proposed to be taken to prevent nuisances at all stages of the project on the Area of Influence.</p> <p>9. A hydrology assessment should be made available. Such assessment must include details for the supply, distribution and storage of potable water. Furthermore, it must include details of collection, storage, overflow and use of rainwater. Ground water and surface water in terms of water quality including run-off management</p> <p>10. Identify the source of ventilation of the underground parking and level of noise that it would generate. It must also cover the noise level that may have effect on the nearest private residence/ bedroom. WHO specifics, that the threshold level for noise exposure which may have a negative effect on the human health range is between 32-42dB.</p> <p>11. Details of proposed sanitary facilities for workers</p> <p>12. Pest control management on site and the surroundings.</p>
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3	Energy and Water Agency (email dated 15 June 2021)	<p>Reference is made to EIA Terms of Reference Consultation for PA/1123/20 with St Albert the Great College, Għaxaq. The following are comments from The Energy and Water Agency divided by considerations which relate to specifically and solely to water management.</p> <ul style="list-style-type: none"> • Two impacts which are not mentioned in Section 6 on the PDS is the (i) increase in water demand and (ii) the reduction of rainwater percolation due to surface sealing. Both of these impacts need to be addressed in the EIA. • As mentioned in the document it is important that all storm water within the development which is falling on the buildup portion on the site above ground, any buildup portion of the site below ground, and sports areas, circulation and hard landscaping, should be harvested in water reservoirs or sustainable urban drainage systems (SUSDs) is included in the design. Of concentrated soft landscaping and green buffers to ensure that no stormwater is discharged outside the site boundary. • The EIA should clearly define the amounts of water which will be utilised by the development, broken down by first- and second-class quality requirements, the source of water planned to satisfy these demands and the availability of black and greywaters generated. Due to the scale of the development, the design for water services should ensure that sufficient water resources should be planned to cover the full water requirement of the development without the consideration of external water inputs such as trucked water supplies. • It is recommended that water efficient fittings and appliances are used. These should include water efficient toilet flushing, hand motion sensor or timed handwash basin water faucets for bathrooms and timed shower mixers if showers are included as part of the sports facility. • Landscaping should respect the Mediterranean character of the Maltese Islands and be compatible with the surrounding environment by utilizing native species of trees, shrubs and plants which do not require excess amounts of irrigation water. Water efficient irrigation systems should be included. • It is recommended that during the design of the building the use of greywater recycling should be considered to contribute to the deficit in 2nd class water available for the use in toilet flushing and also extended to landscape irrigation.

4	Superintendence of Cultural Heritage (dated 1 July 2021)	<p>The Superintendence is concerned that the PDS does not refer to any aspect of cultural heritage such as archaeology, cultural landscape, or historic structures. For example it makes reference to farm buildings stating that they have been judged as having no architectural merit without any evidence or proper discussion.</p> <p>The EIA must include a cultural heritage impact assessment in line with the standard TORs in this regard and in line with the attached document.</p> <p>1.0 Preamble</p> <p>The site in question lies outside the Development Zone, in the limits of Ghaxaq.</p> <p>The Superintendence immediately notes the presence of rubble walls and farm buildings which are a distinctive feature of Malta's countryside. Rubble walls are dry stone walls, constructed in loose unhewn or rough-dressed stones which stand by gravity and friction without the use of any binding agent. The footprint of the mentioned rubble walls on site is on both the 1914 Ordinance Survey Sheet and the 1968 Survey Sheet.</p> <p>The proposal consists of development and intensification of activity over an extensive area. And may spill over the immediate environs. Potential impacts may include direct and immediate material impacts, as well as subsequent impacts that might arise from the modification of the existing situation.</p> <p>2.0 Scope and Definitions of the EIA</p> <p>For the purposes of this document, cultural heritage is defined by Article 2 of the Cultural Heritage Act (2019). This includes movable or immovable objects of artistic, architectural, historical, archaeological, ethnographic, palaeontological and geological importance.</p> <p>2.1 The study area shall include the total footprint of the proposed development.</p> <p>2.2 In the context of this particular application, cultural heritage considerations should take into account:</p> <ul style="list-style-type: none"> • The potential archaeology in or close to the site in question. There are recorded discoveries of a dolmen around 250m south of site and 620m away from a funerary tomb west of site. Other discoveries may be reported following an attentive desk-top study; • The rubble walls and farm buildings that are being proposed for demolition; • Any existing rural paths; • Any other historic features present on site.
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