

The Executive Chairperson
Planning Authority
St. Francis Ravelin,
Floriana

Date: 26/08/2020
ERA Ref: EA 00025/20

Dear Sir,

Planning Ref.: PA 07729/19
Description Proposal: To demolish existing structures and to construct two super markets with underlying basement parking.
Location: Site at, Triq tal-Balal, San Ġwann

Environmental Impact Assessment Regulations, 2017 (S.L. 549.46)

ERA's recommendation and representation on the said development proposal are being lodged in its capacity as an external consultee and an interested party in accordance with the Development Planning Act and the Development Planning (Procedure for Applications and their Determination) Regulations, 2016 (L.N. 162 of 2016).

Reference is made to the Project Description Statement (PDS), which was referred to ERA on 3rd July 2020.

Screening in terms of the Environmental Impact Assessment Regulations, 2017 (S.L. 549.46)

The proposed development falls under the scope of Schedule I Category II Section 7.1.2.1 (*Projects which have: (iii) a gross floor area of 10,000 m² or more for commercial use, including shops, shopping centres, offices or other business*) of the EIA Regulations, 2017 (S.L. 549.46).

The nature of the proposal is such that it does not merit further assessment through EIA studies, since the relatively basic issues identified in the screening (namely rural land uptake, intensification and proliferation of physical development and site formalization) cannot be adequately addressed through detailed EIA studies.

ERA Conclusion and Recommended Way forward

The development raises significant environmental concern and is considered objectionable from an environmental point of view, as already indicated in ERA's earlier screening reply (Doc 54a on E-Apps).

The ERA is also concerned about the further sprawl, proliferation and intensification of urban type interventions within an area ODZ and the further formalisation of the site, since this may inopportunistically serve as a predisposition for other similar proposals within the area as well as on a national scale.

Without prejudice to the above, should the proposal be considered favourably by the Planning Authority against ERA's objection, environmental-related conditions and environmental permitting requirements may be applicable, and ERA would thus need to be re-consulted accordingly. However, such details are currently considered superfluous, in view of the overall objection to the proposal.

Yours faithfully,

Ryan Busuttil

Environment Protection Officer
f/Director Environment & Resources