

Environmental Impact Assessment

Screening according to Schedule III of S.L. 549.46

ERA Reference no.:	EA/00040/20
PA Reference no.:	PA/01001/20
Project Title:	Sanctioning of road widening by third parties and proposed widening to create appropriate access to fireworks factory as per condition 1 of PA1151/17.
Location:	Site at, Landar Ta' Geriska, Gharb
Screening date:	December 2020

I. BACKGROUND

1. Outline of Proposal

1.1 This proposal is for the widening of part of the rural road as well as the sanctioning of already undertaken widening of road in the area of Landar Ta' Geriska, in Gharb (Figures 1 - 5).

1.2 The interventions being proposed are ancillary to the development approved through PA/01151/17 – Construction of a fireworks factory, whereby Condition 1 of the said application states that works on the factory shall not commence unless the development permit of the country road is issued by the Planning Authority. The country road is required for emergency vehicles to access the new fireworks factory.

1.3 The works will involve the following:

- Sanctioning of the already widened road,
- Widening part of the rural road to have a width of 3.7 metres throughout,
- Restoring damaged side walls in the proposed area, and
- Construction of new rubble walls.

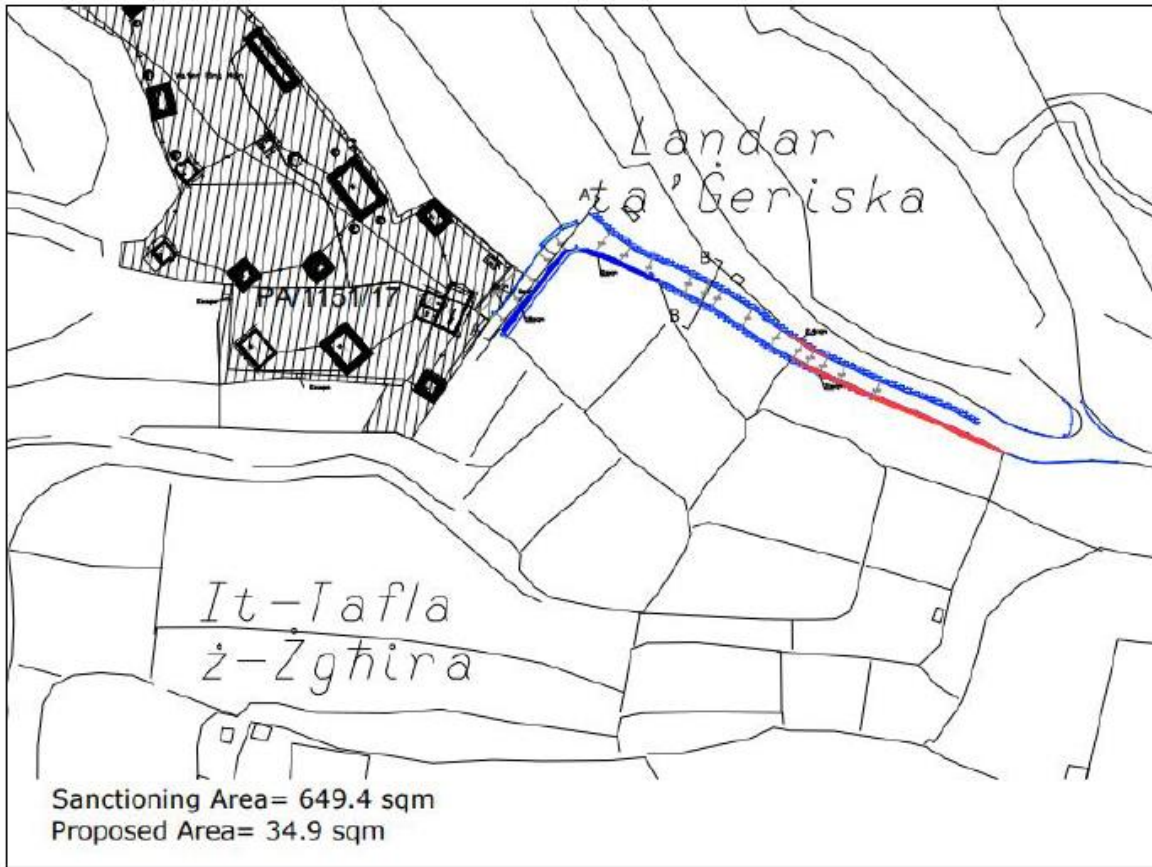


Figure 1: The proposed development showing the area to be sanctioned in blue and the area to be widened in red (Source: PDS pg 10)



Figure 2: The area indicated in red is proposed for widening, part of the existing rubble wall will be rebuilt. The request also involves the trimming of rock to lower the rock to existing road level (Source: PDS pg 19)



Figure 3: Shows some of the rocks that would need to be trimmed to widen the road (*Source: PDS pg 21*)



Figure 4: Shows the third party rubble walls to be restored and part of the rural road to be sanctioned (*Source: PDS pg 23*)



Figure 5: Another part of the rural road to be sanctioned (Source: PDS pg 24)

2. Site context

2.1 The proposed site is located Outside Development Zone (ODZ) and lies at id-Dahla tal-Geriska in Gharb, Gozo (Figures 6 and 7). This is a rural road connected to Triq San Dimitri and also to Triq id-Dahla ta' Cini. The site can be accessed from Triq San Dimitri and Sqaq Ta' Cini.



Figure 6: Map showing the location of the proposed development (Source: PA Geoserver, 2016)



Figure 7: Map showing the location of the proposed development (zoomed) (Source: PA Geoserver, 2016)

2.2 The proposed development is located in an open rural area known as 'Landar ta' Geriska, in Gharb. The area is relatively free from physical development, predominantly characterised by sloping terraced fields and coastal cliff areas. The wider context is important for its overall natural state as well as scenic aspect.

3. Case history

The site was previously subject to the following enforcement notification:

3.1 EC/00752/09: Widening and paving of country road. *Enforcement action suspended. Awaiting final determination of application.*

The site is also an ancillary to the following planning application:

3.2 PA/01151/17: Construction of a fireworks factory. *In view of environmental reservations, this application was conditionally approved (Condition 1: The works approved in this development permission shall not commence before the development permit for the country road is issued by the Planning Authority. This country road is needed to ensure suitable access for emergency vehicles to accede to the new firework factory).*

This case has the following two appeals which are still pending:

PAB/00131/19	Third party appeal against approval
PAB/00163/19	Applicant against conditions

4. Screening Criteria

4.1 EIA Screening

(citations refer to S.L. 549.46, except where otherwise specified):

The proposed development falls within the scope of the Environmental Impact Assessment Regulations (S.L. 549.46), notably in terms of the following Category II criteria in Schedule I: 2.1.2.1. *Construction, excavation or alignment of roads tunnels, viaducts or bridges, not covered by Category I, if located ODZ or at the edge of the development zone.* Therefore, the proposal was screened in terms of the EIA Regulations.

5. Documents used for screening

- a. Project Description Statement (PDS) which was referred directly to ERA by the architect via email on 13th September 2020;
- b. Site visit on 6th October 2020;
- c. ERA's consultation reply (PA/1001/20/66a); and
- d. Site plans and other documents from e-apps at doc 1a, 1c, 16d, 23a-b, 34a

II. ASSESSMENT OF PROPOSAL

6. Assessment of Impacts and Ancillary Considerations

(Screening in terms of Schedule III of the EIA Regulations, S.L. 549.46)

6.1 This current application is proposing the sanctioning of road widening and further proposed enlargement in a rural area in Gharb, Gozo. This proposal is ancillary to another application for a fireworks factory (PA1151/17), to which ERA had already objected on various counts, including likely consequential impacts of future ancillary interventions especially modifications to the site environment to accommodate new or widened access roads. Such intervention was foreseeable and has now been confirmed by this current application. PA 1151/17 was approved by the Planning Authority despite ERA's concerns, with the following condition to the effect that the development can only be implemented if the proposed access road is also approved: *Condition 1: The works approved in this development permission shall not commence before the development permit for the country road is issued by the Planning Authority. This country road is needed to ensure suitable access for emergency vehicles to accede to the new firework factory.*

6.2 In its reply (PA1001/20/66a), ERA noted that the development of the proposed access road entails various modifications to the site environment, including rock cutting, removal of natural vegetation, hard surfacing with concrete/asphalt, and construction/modification of boundary walls along the proposed road. ERA had also noted that in view of the site sensitivity, such interventions do not respect the site context and would result in damage to natural features, visual intrusion in the countryside, and overall degradation of the

sensitive rural landscape. It was also noted that some of the interventions have already commenced on site without the required development permits, on which there is also an active enforcement notice (EC 752/09). The nature of the proposal is such that it does not merit further assessment through EIA studies, since the relatively basic issues and environmental conflicts mentioned above cannot be adequately addressed through detailed EIA studies

6.3 Notwithstanding the above, the ERA takes cognizance of the already approved permit for PA01151/17 and notes that this application (PA01001/20) is ancillary to the fireworks factory for safety purposes. ERA still reiterates its reservations on the proposed fireworks factory development on site (vide comments made on application PA/01151/17) and in relation to this application PA 1001/20 (vide doc 66a), however it is not objecting to this proposal in view of safety considerations relating to the approved fireworks factory.

III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD

ERA reiterates its reservations on the development, however it is not objecting this application in view of safety considerations relating to the already approved fireworks factory. ERA requests that the conditions annexed with this consultation reply (Annex II) are duly included as an approved document in the permit.

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