

Environmental Impact Assessment

Screening according to Schedule III of S.L. 549.46

ERA Reference no.:	EA/00037/20
PA Reference no.:	PA/09046/18
Project Title:	To demolish existing restaurant, wine/ spirit bar and nightclub to construct basement garage and a mixed use complex including a Class 3A guesthouse, Class 4D restaurants, Class 5A crafts business and a Class 3C space for events, spread over four floors.
Location:	Wilderness, Triq I-Gharb, Ghasri, Gozo
Screening date:	October 2020

I. BACKGROUND

1. Outline of Proposal

1.1 PA09046/18 seeks to demolish a derelict building which previously served as an entertainment spot and a restaurant and change it into a mixed-use development comprising a basement garage, Class 3A guesthouse, two Class 4D restaurants, Class 5A craft business and a Class 3C space for events.

1.2 The proposal will cover a total site area of circa 1, 796 m², (Figure 1 and 2) and the construction phase shall consists of:

- A new guesthouse with 22 rooms,
- Catering facilities ancillary to the guesthouse,
- On-site parking facilities,
- Class 5A Craft business centre and retail area, and
- Multi-purpose space for events.

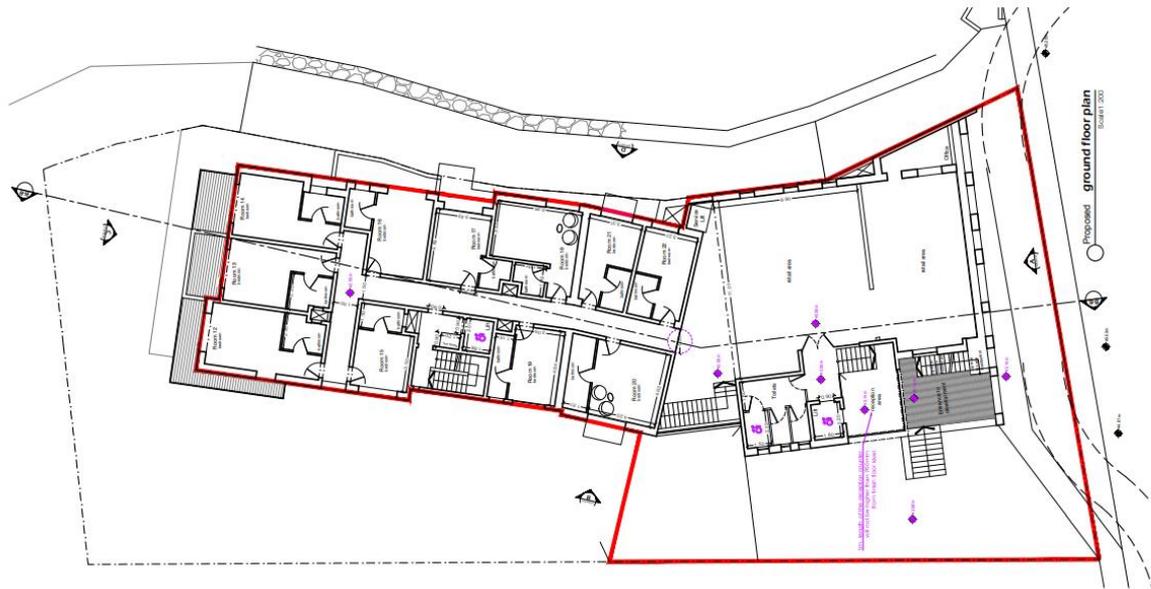


Figure 1: Ground floor (Source: E- apps doc PA9046/18/133d)

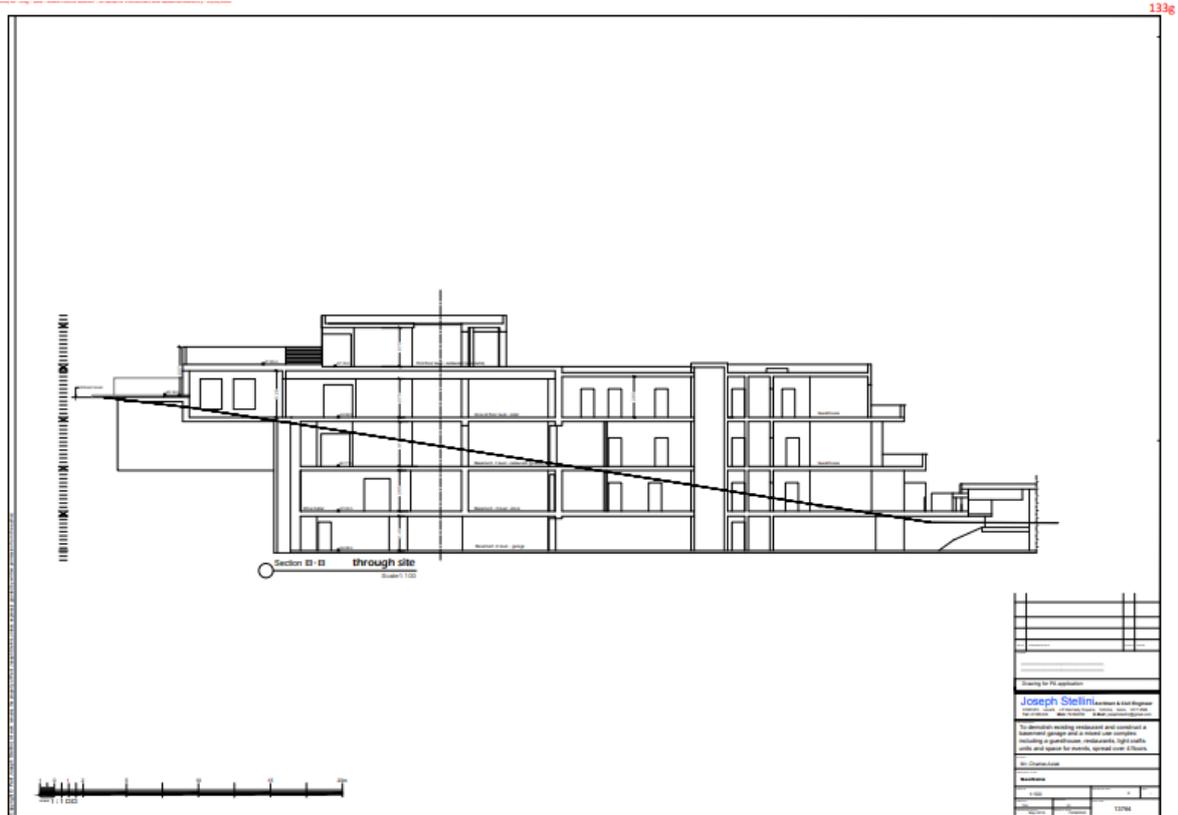


Figure 2: Proposed Section B-B (Source: E- apps doc PA9046/18/133g)

133g

2. Site context

2.1 The proposed site is located Outside Development Zone (ODZ) and lies on one of Gozo's main road at Triq l-Gharb, limits of Ghasri, Gozo (Figure 3 and 4). The specific site sits on the bank of a valley known locally as il-Wied tas-Seqer. The surrounding area is dominated by agricultural land and a farm to its south.

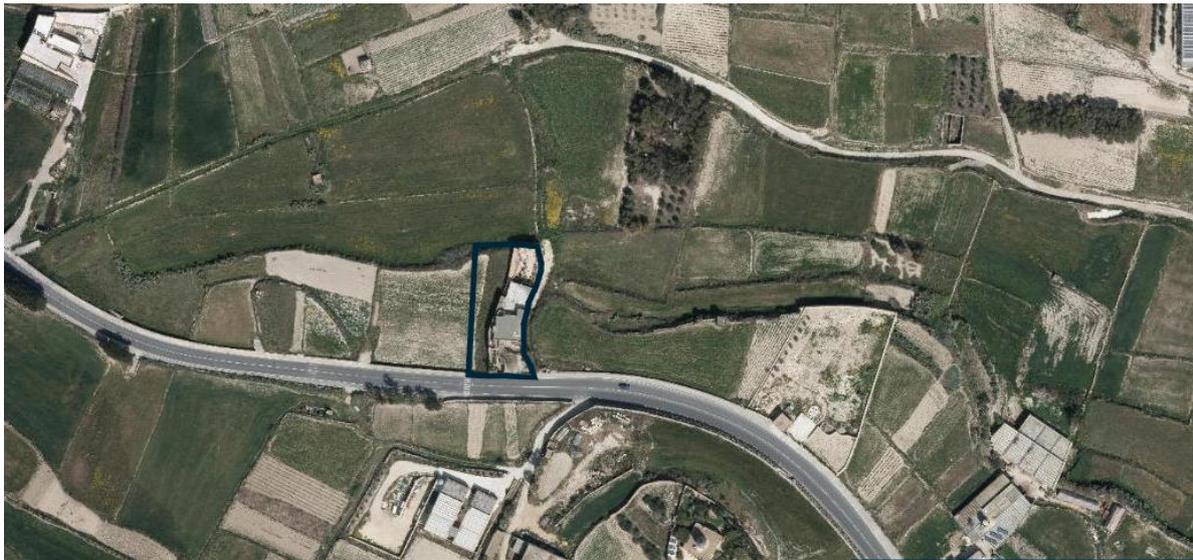


Figure 3: Map showing the location of the proposed development (Source: PA Geoserver, 2016)



Figure 4: Map showing the location of the proposed development (zoomed) (Source: PA Geoserver, 2016)

2.2 Part of the current site (c. 900 m²) is already developed but the building is derelict and the rest of the site is agricultural land. The site also lies circa 100m from the historical Windmill – Il-Mithna ta' bejn Kercem u l-Gharb - which is scheduled as a Grade 1 monument as per G.N. 486 of 2012.

3. Case history

Part of the site was previously subject to the following planning applications:

3.1 PA/04570/96: Extension of bar area. *Application was approved*

3.2 PA/06339/98: To extend discotheque licence prevailing at Wilderness Club, Gharb Road, Victoria, to the area indicated as "Outside Disco Area" on plans. *Application was refused.*

3.3 PA/00279/07: To sanction lower basement, internal and external variations, and change of use to manufacture of traditional agricultural products and agro-tourism. *Application was approved*

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: 7.1.2.2. *Construction or extension of hotels, holiday complexes, holiday village, hostels, homes for the elderly, hospitals, or associated development, if located wholly or partly outside development zones and not covered by Category I.* Therefore, the proposal was screened in terms of the EIA Regulations.

5. Documents used for screening

- a. Project Description Statement (PDS) which was referred to ERA via email on 31st August 2020;
- b. Site visit on 4th September 2020;
- c. ERA's consultation reply (PA/9046/18/82a); and
- d. Site plans and other documents from e-apps at doc 11b – 11f, 21a – 21c, 69a, 73a, 83a, 84a, 127a – h, 130a – e, 133a - 0.

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 Most of the site is currently occupied by a derelict building, with a smaller tract of undeveloped land (arable field) at its side. The current proposal seeks to redevelop the site with a significant net increase in the building footprint and massing through both vertical and lateral extensions when compared to the existing building.
- 6.2 The main concern is that the proposal would result in a massive development that would be even more dominant and incongruous in the landscape than the existing structure. The current proposal fails to follow the terraced topography of the surrounding environment. Instead, it seeks to introduce an excessive number of floors through extensive excavation works to accommodate multiple basement levels that overlook the lower-lying valley bed at the rear of the site. The adverse visual and landscape impact of the proposal are considered significant, particularly at the rear of the site, facing the valley. The scale of the excavation works is also of significant concern.
- 6.3 Furthermore, in order to accommodate the envisaged scale of development, the proposal would also require encroachment onto the currently undeveloped arable part of the site, raising additional concern about further land uptake Outside Development Zone.
- 6.4 Other issues such as construction waste generation, exterior lighting, etc are also relevant, albeit less significant. Nevertheless, such detailed issues are considered premature in the light of other more basic conflicts between the proposed development and its environmental and landscape context.

7. Permitting Requirements

- 7.1 From the submissions provided, the proposal may qualify for an Environmental Permit and for a Medium Combustion Plant (MCP) registration.

III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD

In view of the above identified impacts the current proposal is considered as objectionable from an environmental point of view. The nature of the issues cannot be adequately resolved through further EIA studies and need to be addressed directly through the mainstream development consent process through effective redesign and down-scaling of the proposal.

ERA would be in a position to consider a significantly reduced, more compact development that would address the above concerns, as follows:

- the development should follow the topography of the surrounding environment, and its design and massing should blend more effectively into the landscape;
- the currently proposed excavations should be avoided;
- the massing should be reduced, and the overall profile of the building should be significantly mellowed through reduction of the number of floors. Particular attention should be paid to the rear and side profiles of the building, overlooking the valley.
- The 'depth' of the building and its encroachment toward the valley at the rear of the site should be curtailed.

In this regard, ERA recommends a meeting with the applicant to further discuss the proposal.

Additional environmental-related considerations and permitting requirements would also be relevant but are currently premature in view of the above.

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