

Mr. Charles Axiak  
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Date: 01/10/2020  
ERA Ref: EA 00037/20

Dear Sir,

**Planning Ref.:** PA/09046/18

**Description Proposal:** 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

***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 directly to ERA by the architect on 31<sup>st</sup> August 2020. Following assessment of the proposal, in accordance with the Environmental Impact Assessment Regulations, 2017 (S.L. 549.46), ERA's comments are as follows:

In view of the 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.

Yours faithfully,

Marie Louise Zammit  
Environment Protection Officer  
f/Director Environment & Resources