

Environmental Impact Assessment

Screening according to Schedule III of S.L. 549.46

ERA Reference no.:	EA 00018/23
PA Reference no.:	PA 02903/23
Project Title:	Proposed part-change of use from poultry unit approved in PA/03517/14, removal of silos ancillary to that specific use, and proposed facility including non-permanent structures according to Directives 1 & 3 issued by ARUC Authority for the cultivation of non-medical cannabis plants.
Location:	Site at L-Art Taflija, Triq il-Pitkalija, Rabat (Gozo)
Screening date:	03 January 2024

I. BACKGROUND

1. Outline of Proposal

- 1.1 The proposal is for the change of use from a poultry farm to the production of cannabis. In this regard the existing structures ancillary to the poultry farm shall be repurposed through internal alterations. The existing silos related to the poultry farm at the south-eastern part of the site shall be removed and the land which they occupy restored to its original state.
- 1.2 A fence line for safety and security as part of the new cannabis farm is being proposed on the north-western part of the site. The construction and de-commissioning requirements of the proposed fence line are minimal.
- 1.3 The proposal will not add to the existing built footprint of the site since the already approved structures for agricultural use are proposed to continue to serve the same purpose. The existing processes and workflow related to agricultural uses shall remain unchanged.
- 1.4 The site is connected to existing services and is already served with the energy and infrastructural requirements for the specialised farming expected to take place. The on-street parking at Triq il-Pitkali is sufficient for the envisaged amount of staff required to manage the operations of the site.
- 1.5 The Project Description Statement (PDS) states that all proposed works shall be executed in a single phase over a period of 90 days.
- 1.6 The site area measures approximately 53,500 sq.m, the equivalent of 47.5 tumoli.

2. Site context

2.1 The proposal is located along Triq it-Pitkalija between the towns, Victoria and Xewkija. The area is predominantly agricultural and lies Outside Development Zone (ODZ). The site currently comprises of agricultural fields, greenhouses and stores along with other ancillary structures. Refer to **Figures 1** and **2**.

2.2 The site slopes upwards towards the ridge edge at the north-west part of the site. This part of the site is designated as a Strategic Open Space Gaps, GZ-SETL-2 as per Map 14.9-A and Map 14.13-A of the Gozo & Comino Local Plan (GCLP, 2006). The south-eastern part of the site is a committed greenhouse zone which falls under Policy Greenhouses GZ-AGRI-2 as per aforementioned Maps of the GCLP, 2006.

2.3 An industrial plant lies to the east of the site and is scheduled for Grade 2 architectural protection under G.N. 00300/17.

2.4 The site is located within the 300 m buffer zone of the public groundwater safeguard zone.



Figure 1: Aerial ortho-photo (2018) showing the location of the site in blue along with the delineation of the Development Zone in red. Source: PA Geoserver.

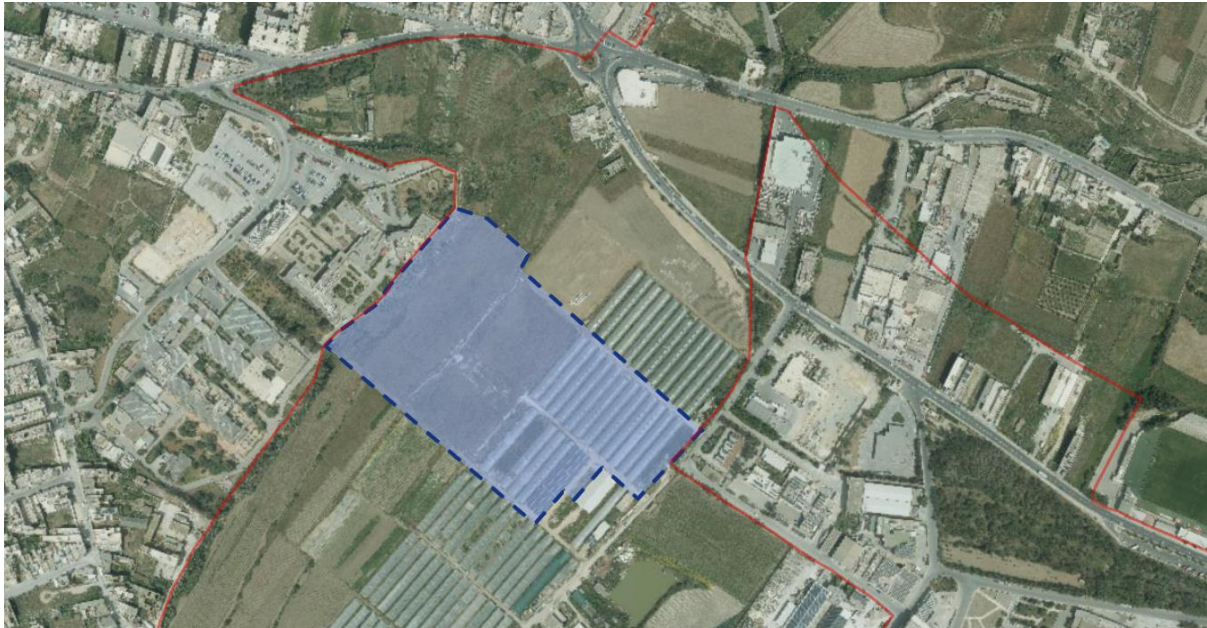


Figure 2: Close-up aerial ortho-photo (2018) showing the location of the site in blue along with the delineation of the Development Zone in red. Source: *PA Geoserver*.

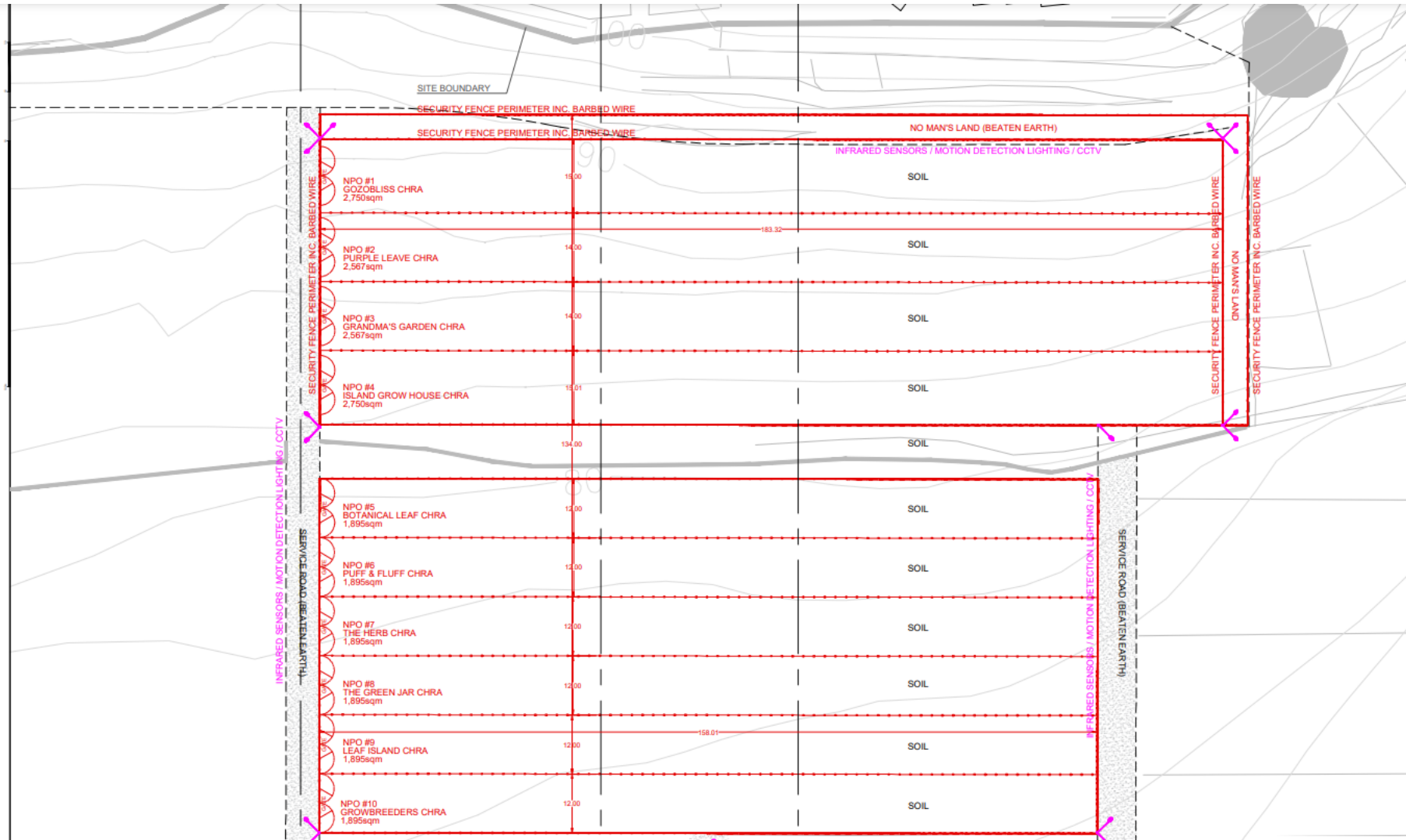


Figure 3: Plan of the proposed fencing of fields at the north-western part of the site. Source: E-Apps PA 002903/23 Doc 32a.

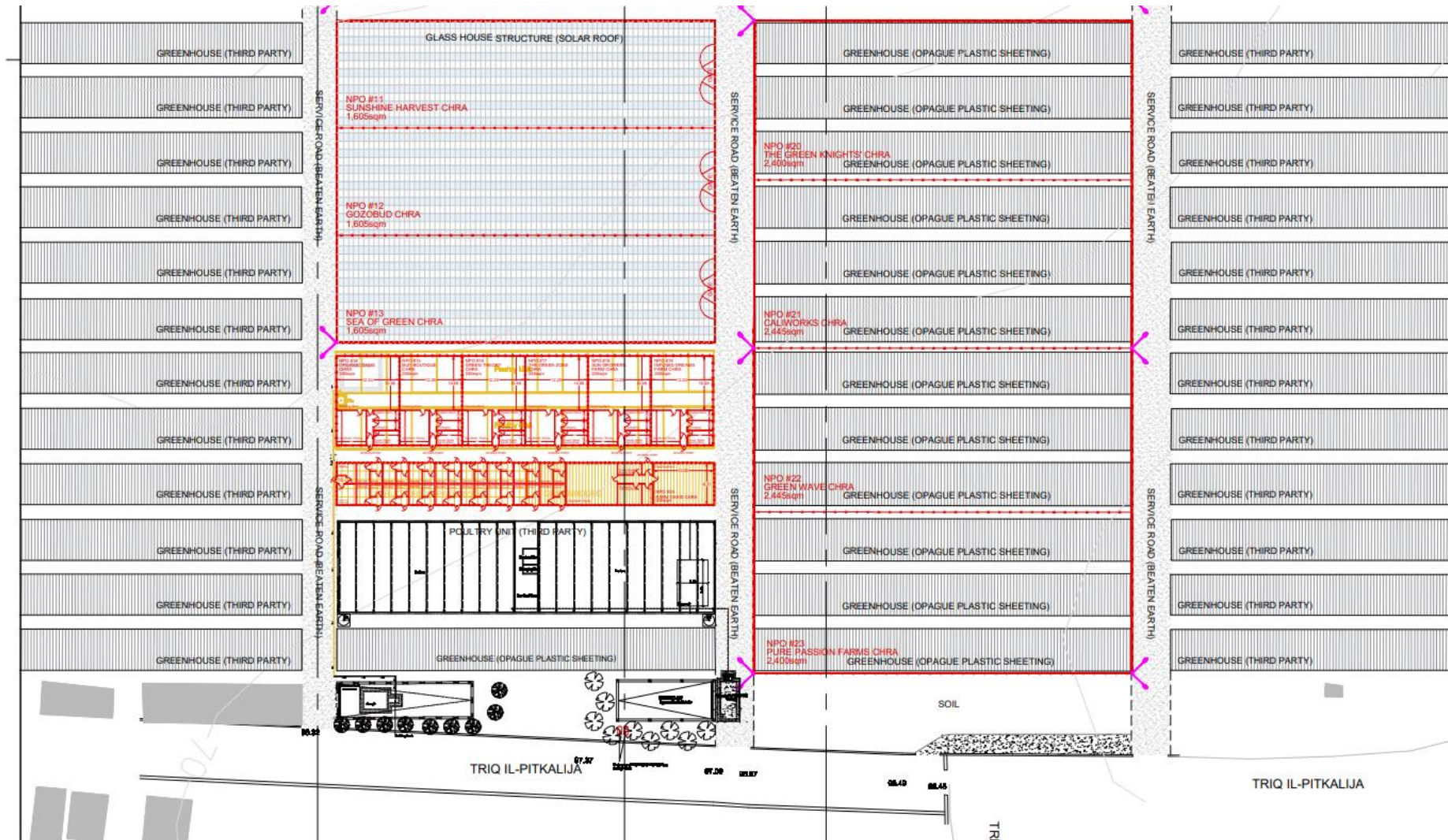


Figure 4: Plan of the proposed interventions at the south-eastern part of the site. Source: E-Apps PA 002903/23 Doc 32a.



Figure 5: Photomontage taken from the west of the site comparing views without and with the proposal.
Source: *PDS Appendix 1*, dated 21/11/2023.

3. Case history

3.1 The site was previously subject to the following Enforcement Notice and Planning Applications, which is relevant to the proposal:

- EC/00057/07: Change of use of greenhouse tent structure for rearing of broilers and Masonry elevation. – Sanctioned.
- PA/02742/04: To construct a cow and poultry farm. – Refused.
- PA/06852/07: To change use from greenhouse to poultry farm and to add a silo and a manure clamp serving this farm. To vacate an existing disused poultry unit, revert its use back to a greenhouse and remove masonry walling and other unauthorized interventions from this structure. – Approved.
- PA/03517/14: To amend permit PA 6852/07, namely to combine two separate poultry units into one unit, including external alterations, and to replace adjacent greenhouse by shed to house facilities ancillary to the poultry unit and install solar panels on proposed roofs. – Approved.
- PA/09940/17: Upgrading of existing greenhouses namely to use glass instead of plastic and to install PV panels above. – Approved.
- PA/00095/20: Construction of a saw dust store, store on a smaller footprint than that approved in Permit PA03517/14, to carry out alterations to broiler shed approved in permit PA03517/14, and to excavate and construct a buried secondary storage facility of LPG. – 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: 1.0.2.1 - *Development with a site area of 2ha or more*; and 13.0.2.1 - *Any change to, or extension of, projects (even if the project is already authorised, executed or in the process of being executed), particularly projects covered by Category I or Category II, where the change or extension itself does not fall under Category I but: (i) meets the thresholds or criteria set out in Category II; or (ii) may have significant adverse effects on the environment.* Therefore, the proposal was screened in terms of the EIA Regulations.

5. Documents used for screening

- Project Description Statement (PDS) along with photomontage report, referred directly to ERA on 22nd November 2023;
- Gozo & Comino Local Plan, 2006; and
- ERA screening reply at Docs PA/02903/23/30a.

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)

General

- 6.1 The existing footprint used for agricultural purposes will remain unchanged. The poultry farm currently present on site shall be converted through internal alterations for the proposed use; and the existing silos shall be removed and the land returned to its original state. The latter is considered favourably in environmental terms.
- 6.2 The construction and de-commissioning requirements of the proposed fence line are minimal. In this regard, there are no significant impacts from a land use point of view also taking into account the reversibility of the proposed fence line.
- 6.3 The introduction of the fence line was envisaged to have a visual impact on the surrounding environment. However, as shown in the submitted photomontages, the proposed fence line would not be dissimilar to the surrounding agricultural structures, such as the greenhouses and so the visual impact is not considered significant.

Construction Phase Impacts

- 6.4 In view that no excavation is being proposed and given the nature of the proposal, there are no impacts on the geo-environment.
- 6.5 Similarly, construction-phase impacts such as dust, noise and light pollution are minor and temporary; and can be minimised at source in line with the Environmental Management Construction Site Regulations (S.L. 552.09).

Operation Phase Impacts

- 6.6 No significant impacts are envisaged as long as all the waste is managed in accordance with the Waste Management Regulations (S.L. 549.63), and efforts are done to recycle and reduce waste generation at source. The conditions set out in the Waste Management (Activity Registration) Regulations (S.L. 549.45) shall be adhered to; and should any of the activities on site exceed the thresholds set out in the same regulations (Schedule 1, Activity 42, 6d), an environmental registration from ERA shall be required.
- 6.7 The proposal is not envisaged to generate significant amount of traffic and so impacts related to air quality and noise during operation are considered insignificant.

III. ERA CONCLUSION AND RECOMMENDED WAY FORWARD

Following screening of this proposal, ERA concludes that the impacts of the development are unlikely to be significant to the point of warranting an EIA, in accordance with Regulation 15 of the EIA Regulations (S.L. 549.46). The ERA conditions in **Annex II** are to be included as part of the development 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 to be re-opened.